

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Shooters Shop Inc, The 2485 S 84th St West Allis, WI 53227, Milwaukee	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 778025-2015-0162-B1B		
	3. PERMIT/LICENSE NUMBER 339079014F01026	4a. TARGET DATE 9/30/2015	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

6. ATF OFFICER(S) ASSIGNED
(b) (6) - Lead Investigator
(b) (6) Assigned Investigator

7. ASSIGNED BY (SIGNATURE, TITLE AND DATE)
(b) (6) Area Supervisor, 10/02/2014

8. PURPOSE/SPECIAL INSTRUCTIONS
Conduct a DE Recall inspection - do not inspect prior to 2/13/2015

9. INSPECTION RESULTS		☐ CHECK IF NO VIOLATIONS, ADJUSTMENTS, ETC		10. TRAVEL EXPENSES (OPTIONAL)	
NO. OF VIOLATIONS	11	NO. OF REFERRALS	1	2111 - PER DIEM	
NO. OF TECS CHECKS	338	NO. OF TECS HITS	1	2112 - P.O.A.	
NO. OF TAX ADJUSTMENTS		\$ VALUE OF TAX INCREASES		2113 - COMM. AIR	
		\$ VALUE OF TAX DECREASES		2114 - RENTAL CAR	
NO. OF ASSESSMENTS		\$ VALUE OF ASSESSMENTS		2115 - GPV EXPENSES	
NO. OF CLAIMS		\$ VALUE OF CLAIMS		2116 - MISC.	
NO. OF TAX PERIODS		\$ VALUE OF TAXES VERIFIED		TOTAL \$ FOR INSP	

11. ATF OFFICER'S RECOMMENDATION
Submitted by (b) (6) Industry Operations Investigator
Submitted on: 11/09/2015

Violts DIO (or Delegate) Held WC ILO Revocation

12. TIME ACCOUNTING DATA	
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b) (6)
JUN 2015	1.00
JUL 2015	3.00
AUG 2015	47.00
SEP 2015	76.00
OCT 2015	37.00
NOV 2015	6.00
DEC 2015	7.00
ATF OFFICER'S SUBTOTAL	177.00
ATF OFFICER'S NAME (MONTH, YEAR, HOURS)	(b) (6)
AUG 2015	65.50
SEP 2015	71.50
OCT 2015	17.00
DEC 2015	7.50
ATF OFFICER'S SUBTOTAL	161.50
TOTAL HOURS	338.50

Assignment and Report

1. OPERATING NAME AND ADDRESS (INCLUDE ZIP CODE AND COUNTY) Shooters Shop Inc, The 2465 S 84th St West Allis, WI 53227, Milwaukee	2. U.I. NUMBER (ORG. SEG. CODE, ASSIGNMENT NO., P.P.C.) 778025-2015-0162-B1B		
	3. PERMIT/LICENSE NUMBER 339079014FD1026	4a. TARGET DATE 9/30/2015	4b. TARGET HOURS
	5. REQUESTED BY (SIGNATURE, TITLE AND DATE)		

13 REVIEW AND ROUTING

REVIEW COMMENTS AND RECOMMENDATION

This licensee reported ^{(b) (6)} arms missing as a result of this inspection. The licensee also had ^{(b) (6)} timely disposition entries identified during this inspection however internal controls appear to be otherwise ensuring timely entries in the record of receipt and disposition. This along with Mr. Nugent's response to the violations demonstrates potential for future compliance. DIO Warning Conference in lieu of revocation is recommended.

Viol's DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☒ FINAL DISPOSITION

SIGNATURE AND TITLE (b) (6) Area Supervisor	(b) (6)	REVIEW DATE 10/15/2015
--	---------	---------------------------

REVIEW COMMENTS AND RECOMMENDATION

DIO Warning Conference and a recall inspection is warranted, in consideration of the Licensee's responses to violations disclosed, the circumstances surrounding the violations, as well as improvements in certain areas which may indicate potential for future compliance.

Viol's DIO (or Delegate) Held WC ILO Revocation

☒ REVIEWED

☒ CONCUR

☒ SEE COMMENTS

☐ FINAL DISPOSITION

SIGNATURE AND TITLE (b) (6) Director, Industry Operations	REVIEW DATE 11/24/2015
--	---------------------------

ROUTING SEQUENCE AND DATE

- ☐ 1. _____
- ☐ 2. _____
- ☐ 3. _____
- ☐ 4. _____

CONTROL FILE POSTED DATE _____

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor THE SHOOTERS SHOP, INC	Street Address 2465 S 84TH STREET	City WEST ALLIS	State WI	ZIP Code 53227	County MILWAUKEE	Page 1 of 4 Pages
License/Permit/Registry Number (if any) 3-39-079-01-7F-01026		Expiration Date 6/1/17	Date(s) or Period of Inspection 8/24/15 (Initiated)			

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
1.	27 CFR 478.21(a)	FORMS In instance, licensee failed to have transferee complete items 10a (Are you the Actual Transferee) of Form 4473. Reference Form [redacted] (112 Stat. 552)	Licensee was instructed to ensure that the transferee completes all items of Form 4473, Section A, before continuing with the transaction.	Immediately
2.	27 CFR 478.99(c)	PROHIBITED SALES - DELIVERIES TO PROHIBITED PERSONS In instance, licensee proceeded with a transaction and transferred a firearm to an individual who answered "yes" to Form 4473 question 11i (misdemeanor crime of domestic violence). Reference Form [redacted] (112 Stat. 552)	Licensee was instructed to stop a transaction where the buyer/transferee indicates they are prohibited from receiving/possessing a firearm.	Immediately
3.	27 CFR 478.124(a)	FIREARMS TRANSACTION RECORD In instances, licensee transferred a firearm but failed to have transferee complete a Form 4473. Reference denied Form [redacted] (112 Stat. 552)	Licensee shall complete Form 4473 when required. Licensee may not re-use or continue a transaction on a Form where the background check has been denied	Immediately

I have Received a Copy of This Report of Violations (Proprietor's signature and title)

Signature and Title of ATF Officer

(b) (6)

Senior Investigator

Date

Date

10/2/15
ATF Form 5810-1
Revised April 2005

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor THE SHOOTERS SHOP, INC	Street Address 2465 S 84TH STREET	City WEST ALLIS	State WI	ZIP Code 53227	County MILWAUKEE	Page 2 of 4 Pages
License/Permit/Registry Number (if any) 3-39-079-01-7F-01026		Expiration Date 6/1/17	Date(s) or Period of Inspection 8/24/15 (Initiated)			

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
4.	27 CFR 478.124(c)(1)	FIREARMS TRANSACTION RECORD In instances, licensee failed to have transferee complete or properly complete items 2, 3, 7 and 11 of Form 4473. See detail in attached addendum A. In item 2, licensee had instructed transferee to record residence address information as shown on transferee's ID, even though information was not current and correct (instances). In item 11, questions were left unanswered in instances.	Licensee was instructed to ensure all items of Form 4473 section A are properly completed by transferee. Transferee must record actual residence address in item 2.	Immediately
5.	27 CFR 478.124(c)(3)(i)	FIREARMS TRANSACTION RECORD In instances, licensee accepted an invalid or insufficient identification document (ID) from transferee. In instances the transferee presented an expired ID. In instance, the expiration date was not recorded. In instances, licensee accepted an ID that did not reflect the transferee's current address.	Licensee was instructed to carefully review ID for transferee's name, current address, date of birth and photo. ID must be a valid government issued document.	Immediately
6.	27 CFR 478.124(c)(4)	FIREARMS TRANSACTION RECORD In instance, firearm information in regard to a [redacted] was omitted from Form 4473 (Reference Form [redacted]).	Licensee was instructed to correct Forms 4473 on a photocopy of the original and ensure firearms information is recorded on Forms 4473 in future.	Immediately

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor THE SHOOTERS SHOP, INC	Street Address 2465 S 84TH STREET	City WEST ALLIS	State WI	ZIP Code 53227	County MILWAUKEE	Page 3 of 4 Pages
License/Permit/Registry Number (if any) 3-39-079-01-7F-01026		Expiration Date 6/1/17	Date(s) or Period of Inspection 8/24/15 (Initiated)			

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you.

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
7.	27 CFR 478.125(e)	RECORD OF RECEIPT AND DISPOSITION Licensee failed to properly maintain a record of receipt and disposition of firearms. Inspection found the following: -licensee failed to properly record firearm information -licensee failed to record the disposition of a firearm -licensee could not account for the whereabouts or disposition of firearms See detail in attached Addendum B.	Licensee was instructed to update and correct the receipt / disposition record for the noted discrepancies. Licensee was also instructed to file ATF F 3310.11, Federal Firearms Licensee Theft/Loss Report for missing firearms.	10/3/15
8.	27 CFR 478.126a	REPORT OF MULTIPLE SALE In instances, licensee failed to timely file ATF F 3310.4, Report of Multiple Sale. Licensee also failed to include information on the Report of Multiple Sale.	Licensee was instructed to file an Amended Form 3310.4 for the Report which omitted the information. Licensee was instructed that Forms 3310.4 should be filed by the close of the business day that the multiple sale occurred.	Immediately
9.	27 CFR 478.129(b)	RECORDS - RETENTION In instances, licensee could not locate Forms 4473 for denied transactions within the last year (Reference Denials). In addition, licensee could not locate or did not maintain Forms 4473 relating to denied or cancelled transactions for years 2011 through 2013.	Licensee was instructed to maintain Forms 4473 for denied or cancelled transactions for a period not less than 5 years.	Immediately

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor THE SHOOTERS SHOP, INC	Street Address 2465 S 84TH STREET	City WEST ALLIS	State WI	ZIP Code 53227	County MILWAUKEE	Page 4 of 4 Pages
License/Permit/Registry Number (if any) 3-39-079-01-7F-01026		Expiration Date 6/1/17	Date(s) or Period of Inspection 8/24/15 (Initiated)			

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
10.	27 CFR 479.86	REGISTRATION OF FIREARMS - ACTION ON APPLICATION In this instance, licensee transferred a firearm silencer to an individual that was not the licensee approved for transfer on the ATF Form 4. The firearm silencer approved for transfer was [REDACTED] (33 Public Law 112-55 (125 Stat. 552))	Transferce returned [REDACTED] (33 Public Law 112-55 (125 Stat. 552)) Licensee was instructed to insure proper firearms are transferred when completing transactions in regard to ATF Forms 3 and 4.	Immediately.
11.	18 U.S.C. 922(z)	SECURE GUN STORAGE OR SAFETY DEVICE Licensee has transferred handguns to non licensed individuals without providing a secure gun storage or safety device for each transfer. Licensee has estimated approximately [REDACTED] handgun transfers took place without a secure gun storage / safety device provided. (33 Public Law 112-55 (125 Stat. 552))	Licensee was instructed that all transfers of handguns to non licensed individuals must include a secure gun storage or safety device as defined in 18 USC 921(a)(34).	Immediately

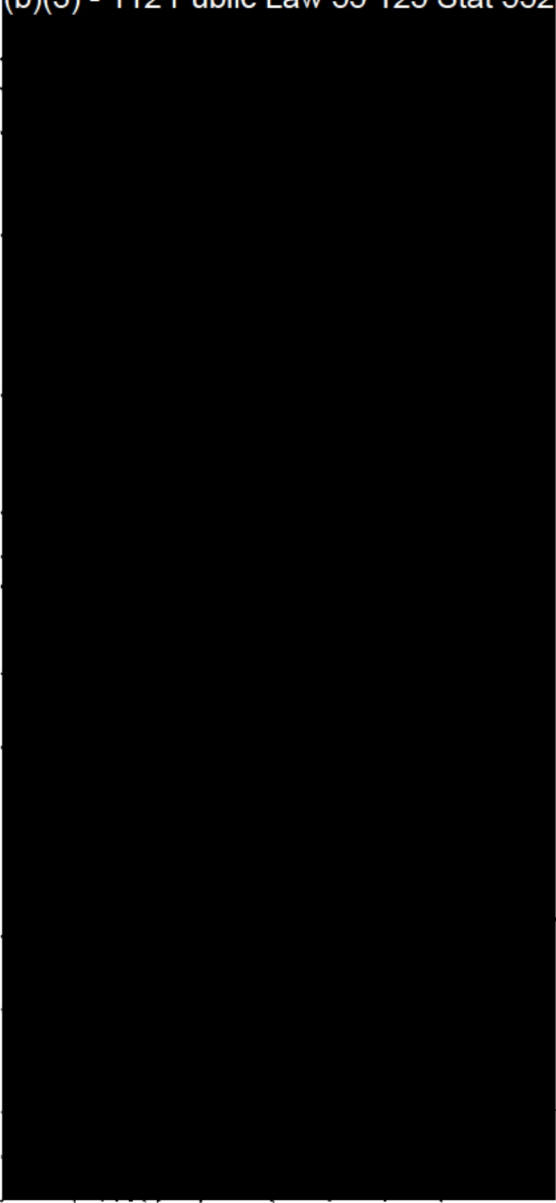
ATF Form 5030
Revised April 2005

The Shooters Shop, Inc

FFL 3-39-01026

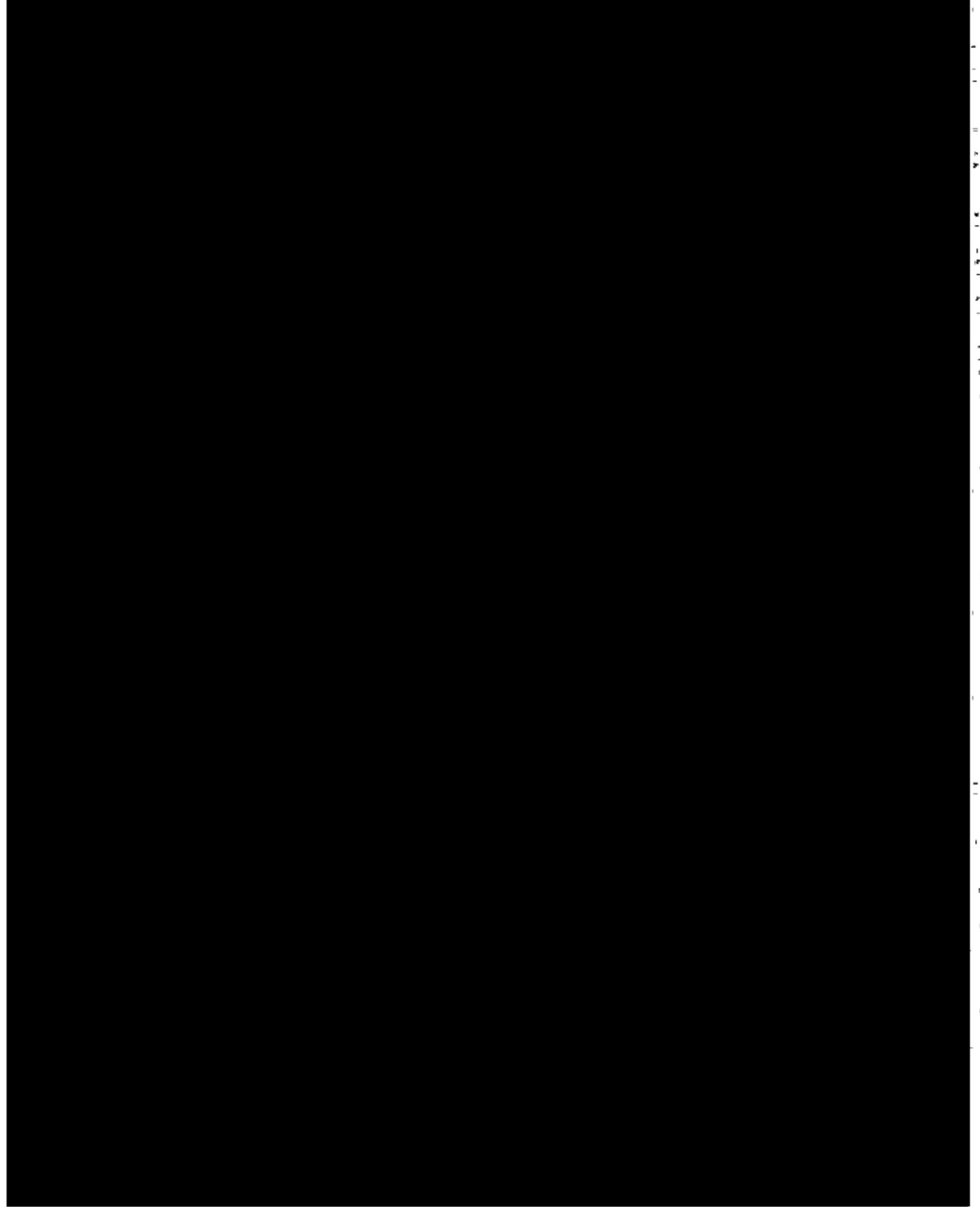
Report of Violations - Addendum A

(b)(3) - 112 Public Law 55 125 Stat 552

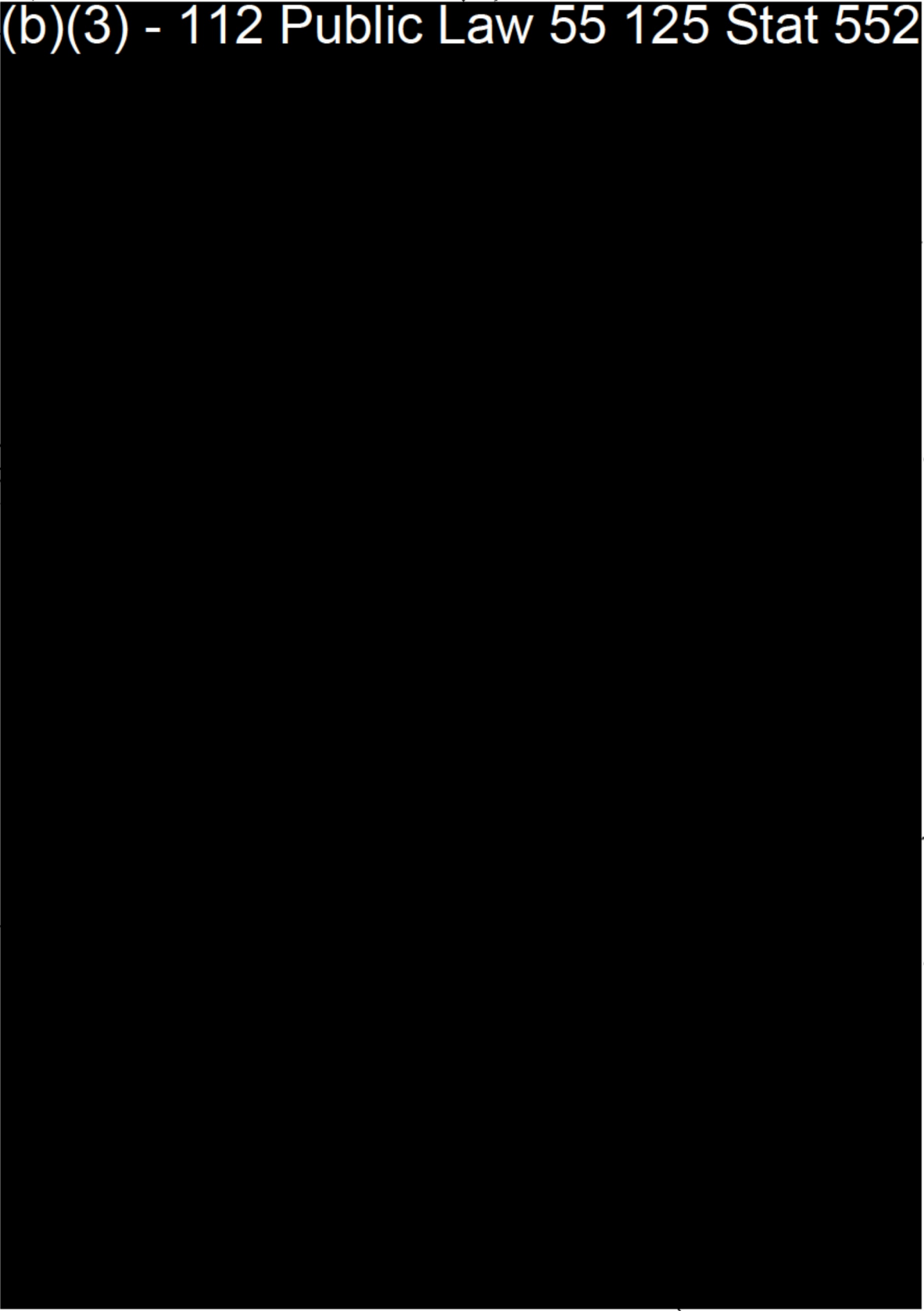


The Shooters Shop Inc
FFL 3-39-01026
Report of Violations - Addendum B

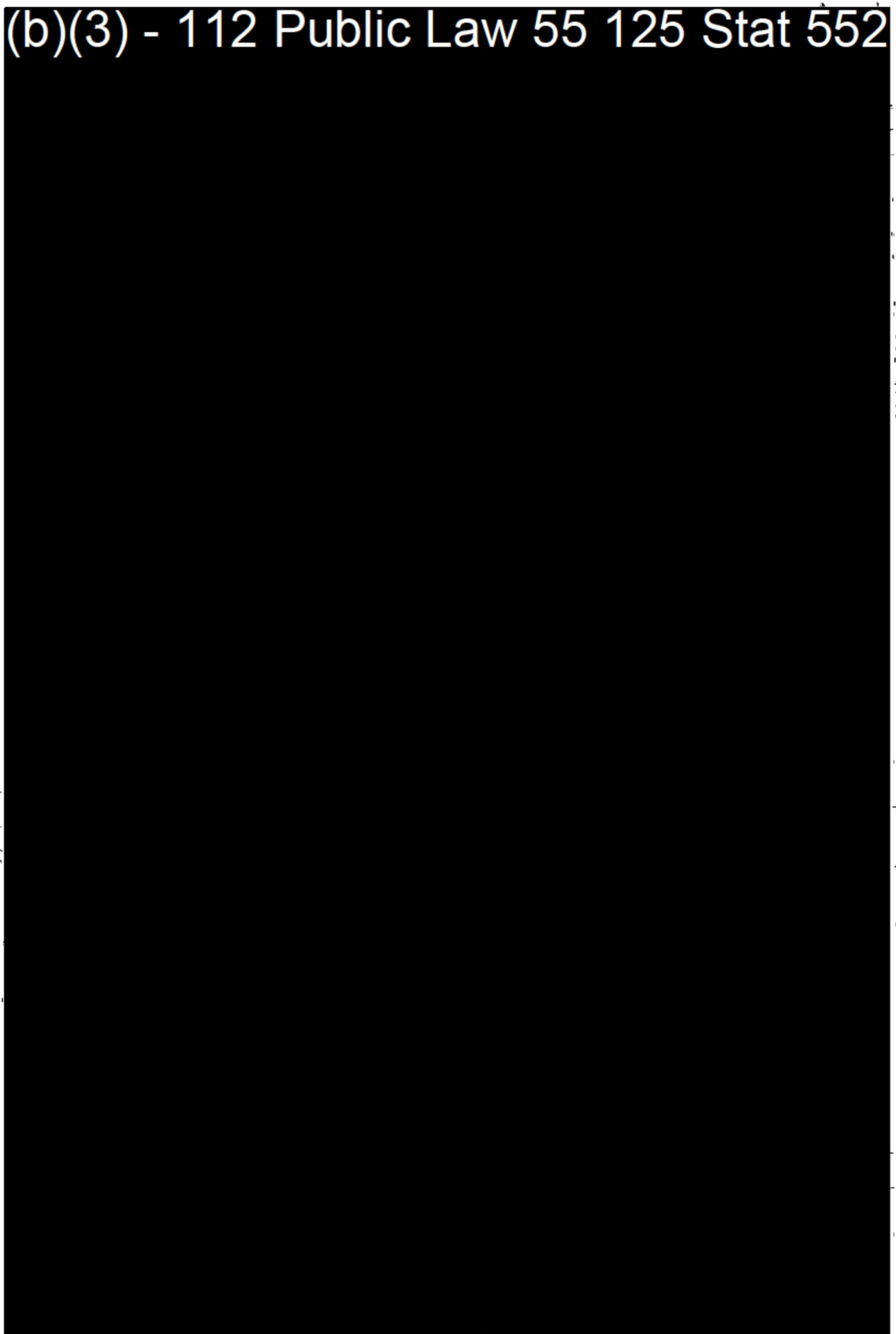
(b)(3) - 112 Public Law 55 125 Stat 552



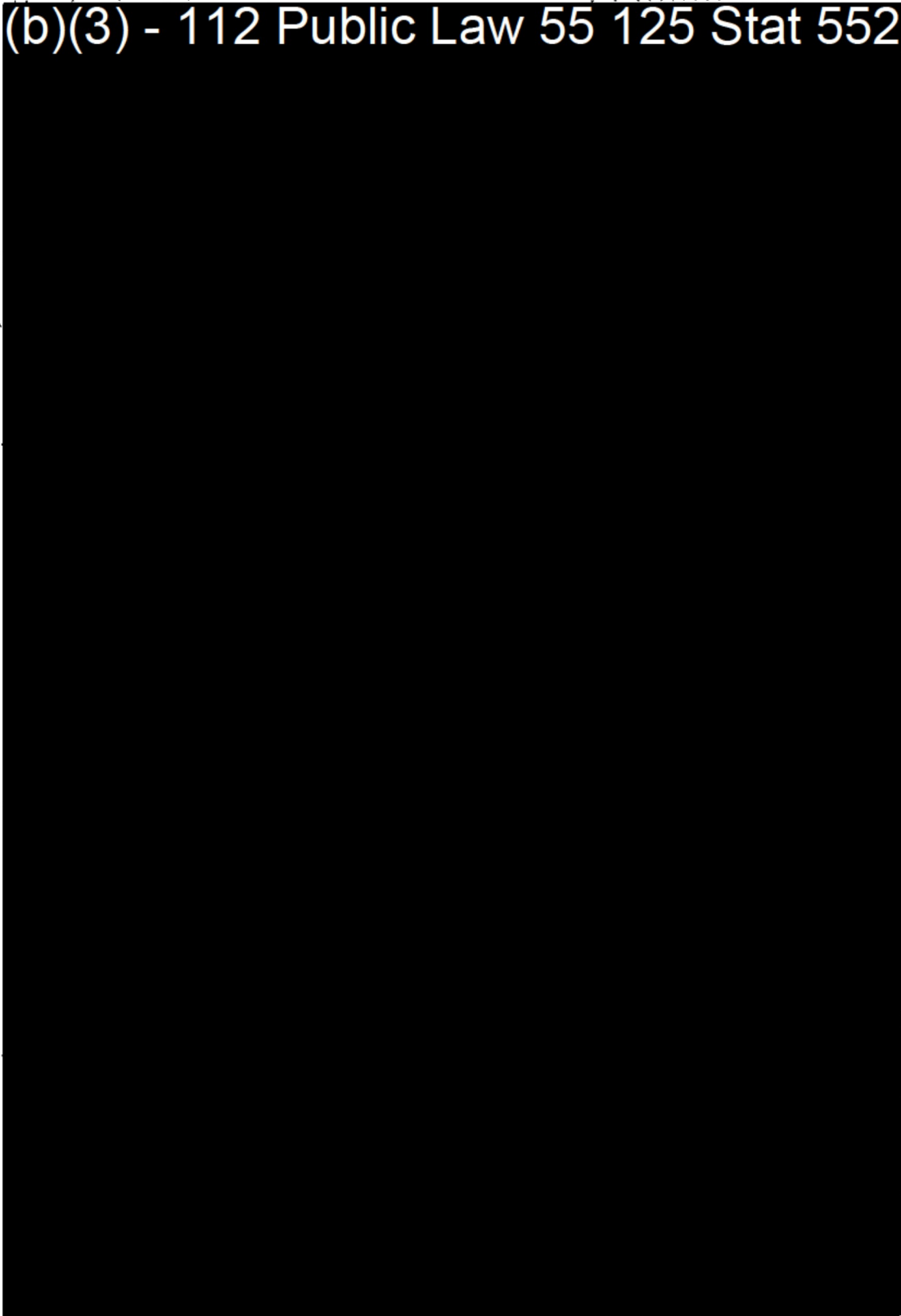
(b)(3) - 112 Public Law 55 125 Stat 552



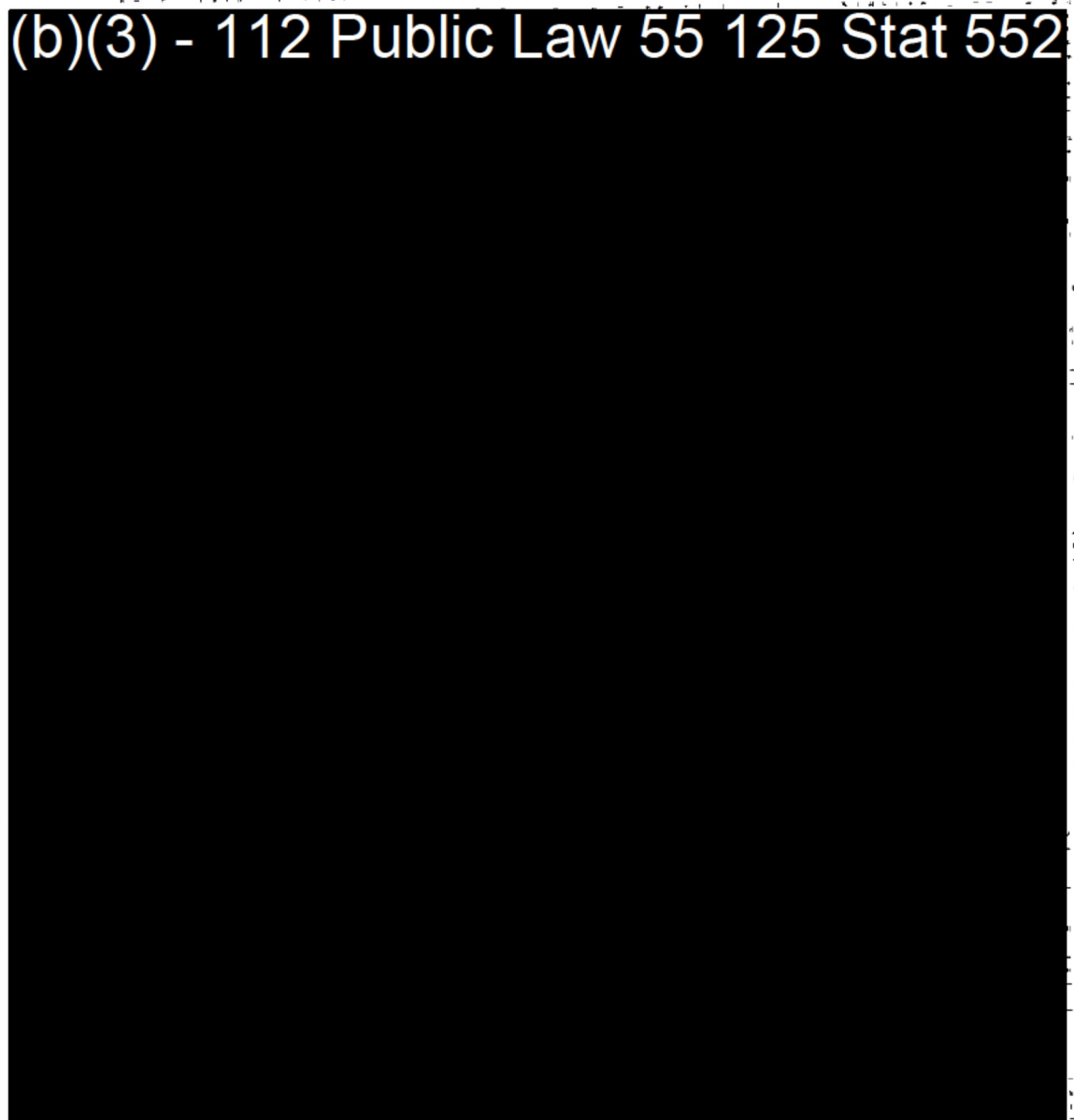
(b)(3) - 112 Public Law 55 125 Stat 552



(b)(3) - 112 Public Law 55 125 Stat 552



(b)(3) - 112 Public Law 55 125 Stat 552



**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

Address: 2465 S 84th Street
West Allis, WI 53227 (Milwaukee County)

1 - Introduction

Inspection Profile:

This report is in reference to a compliance inspection of Federal Firearms Licensee (FFL) The Shooters Shop, Inc. (Shooters Shop or licensee). The inspection was initiated at the licensed premises on 8/24/2015 by ATF Investigators (b) (6) and (b) (6). ATF Industry Operations Intelligence Specialist (IOIS) (b) (6) also participated in the inspection. Manager and Responsible Person Gavin Robinson was present throughout the inspection for Shooters Shop and provided assistance to the investigators as needed. Owner Kevin Nugent was not present at the onset, but was advised immediately of the inspection and met with investigators later in the day on 8/24/15 and again periodically throughout the inspection. The inspection continued through 9/3/15. Licensee was then given an opportunity to review / locate missing inventory and paperwork. Follow up visits were made on 9/10/15 and 9/23/15. A closing conference was held on 10/1/15 and Report of Violations issued on 10/2/15. The inspection was unannounced.

The period for this inspection covered 1/1/14 through 8/24/15.

Shooters Shop has been licensed as a Type 01 Dealer in Firearms under the ownership of Kevin Nugent since 2002. This was licensee's sixth compliance inspection since beginning business. During the last inspection in December 2013, licensee was cited for 9 violations. Most notably, licensee was cited for not being able to account for (b) (6) firearms. See case report UI 778025-2013-0132. A warning conference with the St. Paul Director of Industry Operations was held on 4/23/14. Present for that conference were Kevin Nugent, Gavin Robinson and former manager (b) (6). (b) (6) has since left the Shooters Shop in December 2014 to begin his own business. Shooters Shop has been under the management of Gavin Robinson since (b) (6) departure.

Shooters Shop submits receipt/disposition information to ATF per the (b) (6). Licensee has also been the subject of a large number of firearm trace requests (b) (6). Trace requests were made to the Shooters Shop in the last 12 months. See Trace Report (exhibit 51). This number may be increasing. At the close of the inspection, Mr. Gavin Robinson indicated Shooters Shop was receiving (b) (6) requests per day.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

Business Profile:

Licensee is a high volume retail dealer. Both Title I and Title II firearms are sold. Almost all transactions are with non licensees. Licensee sells both new and used firearms. Most business is in handguns. The source of licensee's firearms is a mix between new purchases, special orders, transfers from other individuals or FFLs and over the counter purchases or trades. Recently, licensee has done a substantial business in the sale/transfer of suppressors, especially to registered Trusts.

Licensee maintains a shooting range on site. A small inventory of firearms is available for rent to customers for use at the range.

There is no manufacturing or importing activity conducted. Gunsmithing or repair service is available but very limited.

Owner Kevin Nugent maintains other businesses in the area which he operates from an office at The Shooters Shop. Both Kevin Nugent and Gavin Robinson were responsible individuals on another FFL license known as The Bunker Army Surplus LLC (3-39-05301). The FFL License for The Bunker had lapsed on 5/1/15. During this inspection at Shooters Shop, Mr. Nugent indicated he re-applied for a license for The Bunker.

Licensee's current employees are: Gavin Robinson, Manager and Responsible Person; (b) (6) Records; (b) (6) Sales; (b) (6) Sales; (b) (6) Sales; (b) (6) Sales; (b) (6) Sales and (b) (6) Sales.

Ownership and Control:

No changes to report. Mr. Nugent stated he is the sole owner of the licensed firearms business. The corporation The Shooters Shop, Inc. is a registered entity with the Wisconsin Department of Financial Institutions and is in good standing.

NCIC/NLETS on Kevin Nugent and Gavin Robinson found no disqualifying information.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

Variance:

Licensee does not maintain any variances with ATF.

2 - Recommendation

Violations cited. Warning Conference with Director, Industry Operations is recommended

3 - Inspection History

Date and Type of Inspection: Compliance Inspection - 12/16/13
UI#: 778025-2013-0132-B1B
Inspection Results: Violations cited - DIO Warning Conference
Cited Violations: -27 CFR 478.102(a)), failure to initiate a background check after 30 days

-27 CFR 478.126a, failure to submit F3310.4 in instances and failure to submit accurate F3310.4 in instances

-27 CFR 478.125(e), licensee could not account for firearms, licensee failed to record receipt of firearms and failed to timely record the disposition in instances

-27 CFR 478.21(a), failure to complete F4473 items 10a, 11a, 25, 30a, 31, 33 and 35.

-27 CFR 478.124(c)(1), failure to have transferee answer questions in item 1 instances)

-27 CFR 478.124(c)(3)(i), failure to record NICS/State transaction information instances)

-27 CFR 478.124(c)(4), failure to complete firearm description instances)

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FPI#: 3-39-079-01-7F-01026

-27 CFR 478.124(c)(5), licensee failed to sign / date
F4473 instances)

-27 CFR 478.21(a), failure to complete all items per
instructions on the form instances)

Date and Type of Inspection: 8/5/2010 – Firearms Compliance
UI#: UI 778025-2010-0159-B1B
Inspection Results: ROV Only – No Further action
Cited Violations: -27 CFR 478.124(c)(3)(ii), failure to establish 90 day
residency for resident alien

-27 CFR 478.125(e), failure to timely note the receipt
or disposition of firearms

Date and Type of Inspection: 2/4/2008 – Firearms Compliance
UI#: 778025-2008-0203-B1B
Inspection Results: ROV Only – No further action
Cited Violations: -27 CFR 478.124(c)(3)(ii), failure to establish 90 day
residency for resident alien

-27 CFR 478.129(b), failure to file denied Forms
4473 separately

Date and Type of Inspection: 1/16/2007 – Firearms Compliance
UI#: 778025-2007-0181-B1B
Inspection Results: ROV Only – No further action
Cited Violations: -27 CFR 478.21(a), failure to sign denied Forms
4473

-27 CFR 478.126a, failure to report multiple sales in
instances

-27 CFR 478.129(b), failure to file denied Forms
4473 separately

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

Date and Type of Inspection: 3/17/2003 – Firearms Compliance
UI#: 778025-2003-0102-A1F
Inspection Results: No violations – No further action
Cited Violations: No violations

License issued: 5/23/02 –
Change in Control

4 - Acquisition & Disposition (A&D) Record - Inventory

A total of [REDACTED] Title I firearms were in stock at the time of inspection. Licensee maintained a manual book A/D record. The current record was a consolidation of open entries from older book records going back several years. In 2014, licensee also began maintaining a computer A/D record as a supplement record for tracking inventory. The computer record was not meant to be an official record with ATF.

Numerous irregularities were noted between the book records and inventory. In [REDACTED] instances, licensee failed to properly record the description of the firearm. In [REDACTED] instance, licensee failed to record the disposition of a firearm. [REDACTED] instances, licensee could not account for the whereabouts or disposition of a firearm. After licensee was given several weeks time to investigate, the [REDACTED] firearms were ultimately reported as “missing” inventory on ATF F 3310.11, Federal Firearms Licensee Inventory Theft/Loss Report.

In further review of the records, it was noted that [REDACTED] firearms were received after the previous inspection conducted December 2013. [REDACTED] of the [REDACTED] missing firearms were received after Mr. Robinson took over as store manager in January 2015.

On 2/14/14, licensee submitted a Theft/Loss report to ATF [REDACTED] firearms found missing from inventory during the previous inspection. On 4/21/14, licensee (b) (6) submitted a fax to ATF Tracing Center listing [REDACTED] firearms that had been located. See exhibit 53. These [REDACTED] firearms were then noted as “Recovered” in the ATF tracing system. During this inspection, Investigators followed up on all firearms reported as found. [REDACTED] of these firearms. [REDACTED] still could not be accounted for. Book records for these firearms had open entries and firearms were not in stock. Neither (b) (6) nor Gavin Robinson could explain.

See Section 13 – Violations.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

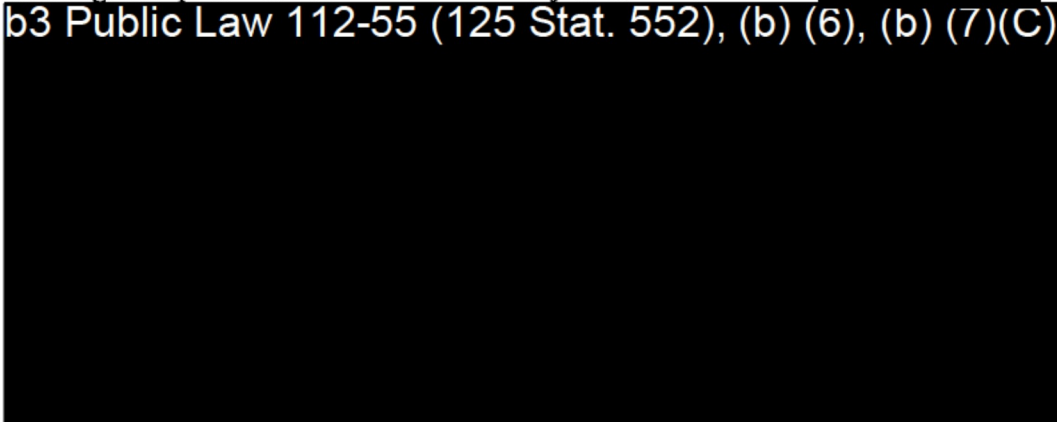
Licensee has had approximately ^{b3 Public Law 112-55 (125 Stat. 552)} receipts of firearms (Title 1) in the last year. Overall business consisted of new and used firearms, special orders and transfers

Licensee maintains an inventory tag system for inventory control. As firearms are received, a tag number is assigned to that firearm which corresponds to a line entry in the A/D Record. The tag also includes a description of the firearm and sale price:

Firearm receipts are recorded in the books by Gavin Robinson. Firearm tags are assigned at that time. When a firearm is sold, tags are stapled to the Form 4473 and sales invoice and provided to ^{(b) (6)} for logging out of the firearms A/D Record.

At the beginning of the inspection, Mr. Robinson stated he took a firearms inventory about a month or two prior and did not detect a problem with the inventory. Mr. Robinson was asked how he took that inventory. He presented several sheets of recorded firearm tag numbers which he wrote down from stock inventory for comparison to the book. Mr. Robinson also stated at the beginning of the inspection that he was not aware of any missing or stolen firearms.

Investigators queried licensee's used inventory of firearms in NCIC. ^{b3 Public Law 112-55 (125 Stat. 552), (b) (6), (b) (7)(C)}
b3 Public Law 112-55 (125 Stat. 552), (b) (6), (b) (7)(C)



5 - ATF Forms 4473 - NICS & Other Dispositions

Licensee maintained approximate ^{b3 Public Law 112-55 (125 Stat. 552)} Forms 4473 for the past 12 months. All Forms were reviewed.

Licensee maintains Forms 4473 in chronological order but also assigns a transaction serial number to the forms. It was noted that on ^{b3 Public Law 112-55 (125 Stat. 552)} occasions in the last year, licensee mis-assigned serial numbers to the Forms 4473 and caused the sequence to be off by a ^{b3 Public Law 112-55 (125 Stat. 552)} in each instance. Licensee was advised of the errors.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

Several violations were disclosed with transactions on Forms 4473. Omissions or errors were noted on several items, including items 3, 7, 10a and 11a through 11i. In instance, licensee proceeded with a transaction despite the transferee answering "yes" to item 11i (misdemeanor crime of domestic violence). This transferee was approved via State background check and a follow up query in NCIC did not find purchaser to be disqualified. In instance, licensee failed to have transferee complete a Form 4473 on the transfer of a firearm. In instances, licensee caused the transferee to erroneously record an incorrect residence address on F4473 (licensee instructed that address in item 2 must match address on driver's license or ID, even though license or ID was not current). In instances, licensee accepted insufficient or invalid (expired) identification from transferee. In instance, a firearm was transferred but omitted from F4473. Finally, licensee failed to retain or locate all Forms 4473 relating to denied or cancelled transactions.

See Section 13 – Violations.

It was noted on Forms 4473 and book records that licensee made many transactions of Title II firearms, mostly suppressors, to registered Trusts. Many transactions were to repeat customers. Review of these Forms indicated that licensee was not conducting NICS background checks on any transfer to a Trust. Mr. Robinson was advised this was not correct and that a NICS check should be initiated on the individual receiving the firearm on behalf the Trust. Mr. Robinson stated the store would begin doing so. No violation was cited. Investigator conducted background checks on many, if not all, individuals receiving firearms on behalf of a Trust. No disqualifying information was disclosed.

NICS Audit Report was obtained for the period 6/15/2015 to 8/14/2015. The Report listed transaction for the period (to include proceed, delay and denied transactions). Licensee had a total "Denied" transactions over the last 12 months. See attached Audit Report (exhibit 50).

Investigators verified a total "Proceed" transactions to licensee's records. No discrepancies were found with any NICS transaction entries. Not all State transaction entries could be verified however. It appears the State may have run multiple queries for the same transaction. The Audit Report only lists NICS NTN Numbers. Without a State approval number or form number for reference, a complete verification of State checks was not possible.

Licensee's "Denied" transactions were reviewed from January 2014 forward. Licensee could not immediately find all "Denied" transactions for this time period. Some "Denied" Forms were filed in with the "Proceed" Forms. Another folder of "Denied" Forms was later found stored with other past records in licensee's garage. Ultimately, for the inspection period, Forms for "Denied" transactions could not be

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

located, [REDACTED] See Audit Report (exhibit 50). Furthermore, licensee could not locate all "Denied" Forms for the past five years. Forms for years 2011 to 2013 could not be located. See Section 13- Violations

6 - Multiple Sales

[REDACTED] instances, licensee failed to timely file ATF F3310.4, Report of Multiple Sales. These Forms were filed two or three days after the actual transfer date. See Section 13- Violations. A total of [REDACTED] handguns were associated with these Forms. In one of the instances [REDACTED] was transferred but omitted from Form 3310.4. Licensee was instructed to submit an amended F3310.4 for that transaction. See Section 13 - Violations.

7 - Suspicious/Prohibited Purchasers

Information on suspicious purchasers was shared with IOIS (b) (6) during the inspection.

Store Manager Gavin Robinson was himself associated with [REDACTED] multiple sales and [REDACTED] firearms traces (same firearm). See Trace Report (exhibit 51).

8 - Trace Activity

Licensee had [REDACTED] firearm trace requests in the last year and [REDACTED] trace requests in the last 3 years. See Trace Report (exhibit 51).

b3 Public Law 112-55 (125 Stat. 552)

9 - NFA/Importer/Collector/Manufacturer

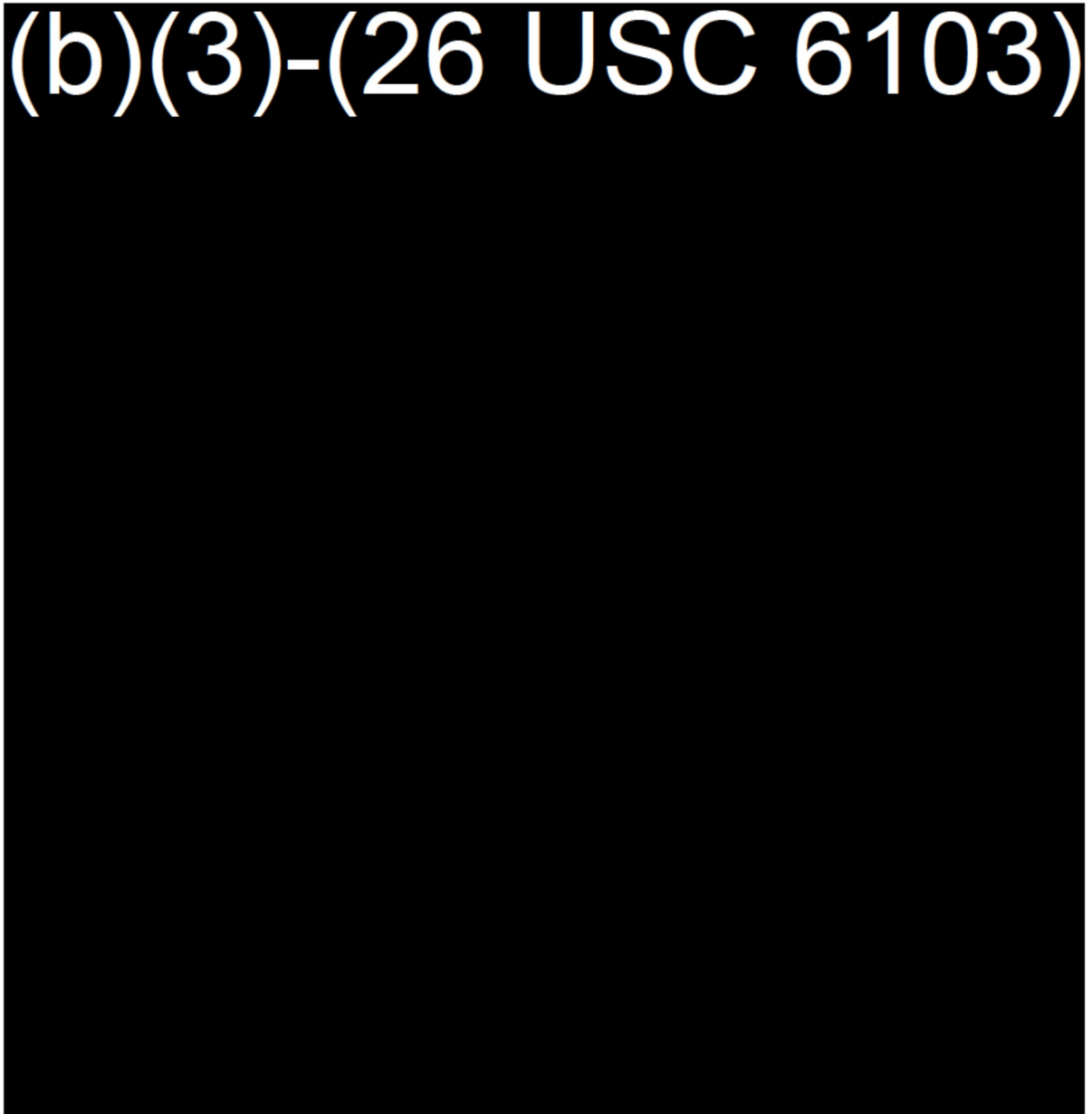
(b)(3)-(26 USC 6103)

BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT

Name: The Shooters Shop, Inc.
Trade Name:

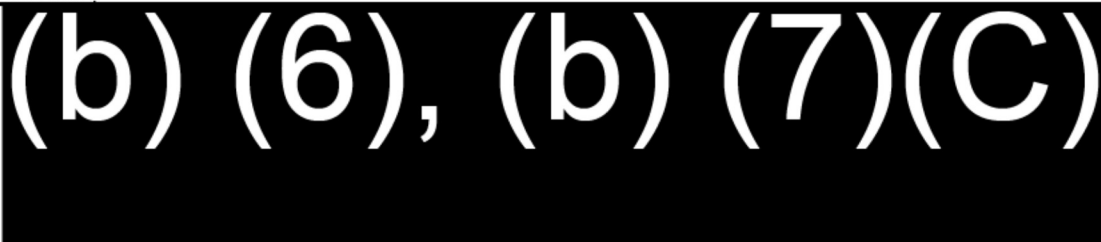
UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

(b)(3)-(26 USC 6103)



10 – Referrals

(b) (6), (b) (7)(C)



**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

11 - Other

Nothing additional to report.

12 - Closing Actions

On 10/1/15, Investigators (b) (6) and (b) (6) held a closing conference with owner Kevin Nugent and Manager Gavin Robinson. All violations and necessary corrective action were reviewed. The issue of the missing firearms was discussed in detail. See licensee's responses to particular violations in Section 13 - Violations. Also discussed at the closing was the need for accurate firearm description in the records, proper identification documents, completion and retention of Forms 4473, Reports of Multiple Sale, secure gun storage, NFA, Trusts, internal controls and straw sales. Mr. Nugent was asked if all employees understood that a straw sale was illegal. He said that they did and know they should stop a transaction where they believe a straw sale is taking place. Licensee was provided ATF P5300.15, Federal Firearms Licensee Quick Reference Guide and referred to the guidance in the Section on Prohibited Transfers - Straw Purchasers.

Mr. Nugent expressed his disappointment and frustration with the results of the inspection, especially inventory and missing firearms. Mr. Nugent pointed out this was the second inspection in a row that numerous firearms could not be accounted for. He stated this was unacceptable. Mr. Nugent stated he has been in business for 13 years and been through several ATF inspections. He continued to say that all inspections have had good results, except for the last two. Mr. Nugent stated he has met with both Gavin Robinson and (b) (6) and instituted additional controls. The store will conduct a spot check inventory of firearms every few weeks and a full inventory every quarter. Files will contain complete documentation for every firearm received / sold by Shooters Shop, to include receipt documents, inventory tags, sales invoices, Federal and State forms. Forms will be double checked at every transaction to ensure everything is completed properly and firearms are logged out. Mr. Robinson stated that on slow days, employees will perform record audits.

Both Mr. Robinson and Mr. Nugent stated that on (b) (6) last day at work, he made the remark to Mr. Robinson and (b) (6) "Have fun on your next ATF audit." Mr. Robinson stated he has called (b) (6) several times since January 2014 for assistance and follow up on certain business matters with Shooters Shop, but (b) (6) has not been cooperative.

Investigator (b) (6) conducted a firearms regulations review per the "Acknowledgement of Federal Firearms Regulations." Mr. Nugent signed and received a copy of the "Acknowledgement" for his records. See exhibit 57.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

Mr. Gavin Robinson was instructed to file an ATF F3310.11, Federal Firearms Licensee Theft/Loss Report for the firearms identified as unaccounted for. Mr. Robinson filed this report on 10/2/15. Mr. Robinson also notified the West Allis Police Department. Capt. (b) (6) West Allis PD, contacted Investigator (b) (6) on his receipt of the report of missing firearms at Shooters Shop (exhibit 54).

A Report of Violations was not issued on 10/1/15 as information came up during the closing which changed the Report. Report of Violations was issued to Mr. Nugent on 10/2/15. See attached. All corrective action had been completed.

Prior to submission of this report, investigators noticed a discrepancy in the serial number of the firearms reported missing -- [REDACTED] It was discovered that the wrong firearm serial number was carried forward from previous books. Correct s/n should be [REDACTED] In a similar way, investigators discovered a serial number discrepancy to another missing firearm [REDACTED] Again, the wrong firearm serial number was carried forward from previous books. Correct serial number should be [REDACTED] Mr. Gavin Robinson was instructed to contact the ATF Tracing Center and report the corrected serial numbers to the [REDACTED]

13 - Violations

1.

**FORMS
27 CFR 478.21(a)**

-repeat violation from 2013 and 2007 inspections-

Nature of the Violation: [REDACTED] instance, licensee failed to have transferee complete items 10a (Ethnicity) and 11a (Are you the Actual Transferee) of Form 4473.
Reference Form [REDACTED]

The transferee on the Form in question failed to complete all of item 11.

See Inspection Worksheet 2 and exhibit 33.

Licensee's Response: Mr. Robinson acknowledged the violations and indicated the transaction related to an NFA transfer and was just an oversight. Mr. Robinson stated he will be sure to review these closer in the future.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

Corrective Action: Licensee was instructed to ensure that the transferee completes all items of Form 4473, Section A, before continuing with the transaction.

2. **PROHIBITED SALES – DELIVERIES TO PROHIBITED PERSONS**
27 CFR 478.99(c)

Nature of the Violation: In ^{b3 Public Law 112-55 (125 Stat. 552)} instance, licensee proceeded with a transaction and transferred a firearms to an individual who answered "yes" to Form 4473 question 11i (misdemeanor crime of domestic violence). Reference Form ^{b3 Public Law 112-55 (125 Stat. 552)}

See Inspection Worksheet 2 and exhibit 24.

Licensee's Response: Mr. Robinson and Mr. Nugent acknowledged the violation. Mr. Robinson pointed out that the transferee passed the background check. Investigator ^{(b) (6)} advised that that the background check should not have been run and the transaction should have been stopped. Mr. Nugent agreed. Mr. Robinson stated all employees will pay closer attention to answers on Form 4473 in the future.

Corrective Action: Licensee was instructed to stop a transaction where the buyer/transferee indicates they are prohibited from receiving/possessing a firearm.

3. **FIREARMS TRANSACTION RECORD**
27 CFR 478.124(a)

Nature of the Violation: In ^{b3 Public Law 112-55 (125 Stat. 552)} instance, licensee transferred a firearm but failed to have transferee complete a Form 4473. Reference denied Form ^{b3 Public Law 112-55 (125 Stat. 552)} and subsequent transfer on 7/30/15.

Records indicate that the transferee ^{b3 Public Law 112-55 (125 Stat. 552)}
b3 Public Law 112-55 (125 Stat. 552)

See Inspection Worksheet 2 and exhibit 46.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

Licensee's Response: Mr. Robinson and Mr. Nugent acknowledged a new Form 4473 should have been completed for the transfer. Mr. Robinson stated the sales clerk must have believed the initial – denied F4473 could be used.

Corrective Action: Licensee shall complete Form 4473 when required. Licensee may not re-use or continue a transaction on a Form where the background check has been denied.

4.

FIREARMS TRANSACTION RECORD

27 CFR 478.124(c)(1)

-repeat violation from 2013 inspection-

Nature of the Violation: ^{03 Public Law 112-55 (125 Stat. 552)} instances, licensee failed to have transferee complete or properly complete items 2, 3, 7 and 11 of Form 4473. In item 2, licensee had instructed transferee to record residence information ^{03 Public Law 112-55 (125 Stat. 552)} as shown on transferee's ID, even though information was not current and correct ^{03 Public Law 112-55 (125 Stat. 552)} instances). In item 11, questions were left unanswered in ^{03 Public Law 112-55 (125 Stat. 552)} instances.

See inspection Worksheet 2 and exhibits 7, 9, 17, 19, 20, 21, 23, 25, 27, 31, 32, 33, 34, 35, 36, 37, 39, 40, 41, 42 and 44.

Licensee's Response: Mr. Robinson explained that it was his understanding that the address information on F4473 and State form must match information on transferee's ID. That is why so many customers wrote one address on the forms (their current address), only to cross it out and record the address off their driver license or State ID. Mr. Robinson stated Shooter Shop employees would instruct customers to record the address off their ID. Mr. Robinson stated Shooter Shop employees would personally take the customer's ID and record name and address information onto the store's sales invoice. Mr. Robinson stated all employees now understand that the customer must record his current/correct address on both the F4473 and State Form and the customer's ID must support that address.

Corrective Action: Licensee was instructed to ensure all items of Form 4473 section A are properly completed by transferee. Transferee must record actual residence address in item 2.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

5.

FIREARMS TRANSACTION RECORD

27 CFR 478.124(c)(3)(i)

-repeat violation from 2013 inspection-

Nature of the Violation: [REDACTED] instances, licensee accepted an invalid or insufficient identification document (ID) from transferee. [REDACTED] of those instances, the transferee presented an expired ID. [REDACTED] instance, the expiration date was not recorded. [REDACTED] instances, licensee accepted an ID that did not reflect the transferee's current address.

See Inspection Worksheet 2 and exhibits 4, 7, 9, 15, 16, 17, 18, 19, 21, 22, 23, 24, 27, 28, 29, 30, 31, 33, 34, 37, 38, 39, 40, 42, 43 and 44.

Licensee's Response: See response in violation #5. Mr. Nugent acknowledged that the transferee identification document(s) must be current and valid and transferee must record their current residence address on Form 4473.

Corrective Action: Licensee was instructed to carefully review ID for transferee's name, current address, date of birth and photo. ID must be a valid government issued document.

6.

FIREARMS TRANSACTION RECORD

27 CFR 478.124(c)(4)

-repeat violation from 2013 inspection-

Nature of the Violation: [REDACTED] instance, firearm information in regard to a [REDACTED] was omitted from Form 4473 (Reference Form [REDACTED])

On this transaction, the [REDACTED] was not on the F4473 nor the associated Multiple Sale Report, but was on the sales invoice. Handwriting for [REDACTED] appeared different than the writing for the other [REDACTED] firearms on the invoice. See Inspection Worksheet #2 and exhibit 13.

Licensee's Response: Licensee acknowledged the violation but could not explain how this happened. Mr. Robinson pointed out the transaction was handled by former manager [REDACTED] (b) (6) was asked about the transaction and stated she normally reviews Forms 4473 to invoices prior to logging firearms out and completing Multiple Sale Reports. [REDACTED] (b) (6) could not explain how this discrepancy got passed her.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

Corrective Action: Licensee was instructed to correct Forms 4473 on a photocopy of the original and ensure firearms information is recorded on Forms 4473 in future

7.

**RECORD OF RECEIPT AND DISPOSITION
27 CFR 478.125(e)
*-repeat violation from 2013 and 2010 inspections-***

Nature of the Violation: Licensee failed to properly maintain a record of receipt and disposition of firearms. Inspection found the following:

- licensee failed to properly record firearm information in [REDACTED] instances
- licensee failed to record the disposition of a firearm in [REDACTED] instances
- licensee could not account for the whereabouts or disposition of [REDACTED] firearms

The [REDACTED] discrepancies on firearm description consisted of incomplete or inaccurate manufacturer / importer information, incorrect or incomplete serial numbers and incorrect model information. On the missing firearms, it was noted that [REDACTED] firearms were received after the previous inspection conducted December 2013. [REDACTED] missing firearms were received after Mr. Robinson took over as store manager in January 2015. [REDACTED] firearms were first reported missing to ATF on 2/14/14, then reported found (among others) on 4/21/14 per fax from (b) (6) to ATF Tracing Center. These [REDACTED] firearms are now again unaccounted for.

See Inspection Worksheet 1 and copies of corresponding entries in licensee's A/D record (exhibit 1).

Licensee's Response: After the physical inventory, investigators provided Mr. Robinson with a list of firearms which were open in the records and could not be found in stock. Over the next few days, several firearms were either located in stock or found recently sold. Licensee still had a substantial list of firearms which needed to be accounted for and was given about a month's time to do so. Both Mr. Robinson and Mr. Nugent were advised the seriousness of the missing firearms. Both acknowledged it was a serious matter. Mr. Robinson stated he and his employees took time going through records looking for the noted firearms. All Forms 4473 were reviewed to the last inspection. (b) (6) had reviewed the missing firearm list to her computer record with no success. Investigators reviewed Mr. Robinson's previous inventory listing of firearm tag numbers in stock to see if any missing firearms turned up on that list. There was no match.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

In the end, neither Mr. Robinson nor Mr. Nugent could explain what happened to the firearms. Mr. Robinson speculated that (b) (6) may have misplaced sales information prior to leaving the business. Mr. Nugent stated he did not believe any firearms could have been taken by employees. He indicated he trusts all his workers and they know what a serious crime it would be stealing from an FFL. However, Mr. Nugent also said if anyone was found walking out with firearms from Shooters Shop, he wants them prosecuted. Overall, Mr. Nugent was upset and concerned over the findings, indicating this was the second inspection in a row with missing firearms. Mr. Nugent admitted this was unacceptable.

Corrective Action: Licensee was instructed to update and correct the receipt / disposition record for the noted discrepancies. Licensee was also instructed to file ATF F 3310.11, Federal Firearms Licensee Theft/Loss Report for the missing firearms (exhibit 54).

8.

**REPORT OF MULTIPLE SALE
27 CFR 478.126a
-repeat violation from 2013 and 2007 inspections-**

Nature of the Violation: In two instances, licensee failed to timely file ATF F3310.4, Report of Multiple Sale, Reference Forms (b) (6) b3 Public Law 112-55 (125 Stat. 552) b3 Public Law 112-55 (125 Stat. 552) In regard to transaction (b) (6) licensee also failed to include a (b) (6) on the Report of Multiple Sale.

Above noted submissions occurred two or three days after the date of sale/transfer.

A total (b) (6) handguns were involved in these late or incorrect Multiple Sale Reports. See Inspection Worksheet 2 and exhibits 2, 3, 5, 6, 8, 10, 11, 12, 13, 14, 26 and 45.

Licensee's Response: Mr. Robinson and (b) (6) stated they believed Reports of Multiple Sale had to be filed by the next business day (both were corrected and advised the Report had to be filed by the close of the same day as multiple sale occurred). Nevertheless, above noted submissions occurred two or three days after the date of sale/transfer. (b) (6) explained this was likely due to the fact that the sale occurred over the weekend and she did not file the Report until Monday when she returned to work.

Corrective Action: Licensee was instructed to file an Amended Forms 3310.4 for the Report which omitted the Ruger Security Six. Licensee was instructed that Forms 3310.4 should be filed by the close of the business day that the multiple sale occurred.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

9.

RECORDS - RETENTION

27 CFR 478.129(b)

-repeat violation from 2007 inspection-

Nature of the Violation: ^{b3 Public Law 112-55 (125 Stat. 552)} In instances, licensee could not locate Forms 4473 for denied transactions within the last year (^{b3 Public Law 112-55 (125 Stat. 552)} [REDACTED]). In addition, licensee could not locate or did not maintain Forms 4473 relating to denied or cancelled transactions for years 2011 through 2013.

See Inspection Worksheet 2 and exhibit 50.

Licensee's Response: Licensee was initially missing numerous denied/cancelled Forms 4473 when investigators began their review. Investigators located several Forms filed with completed "proceed" Forms 4473 and Mr. Robinson found others. Mr. Robinson acknowledged the retention requirement and believed past Forms 4473 were located somewhere in the "garage" where 13 years of records were kept. Mr. Robinson could not explain the whereabouts of the Forms to ^{b3 Public Law 112-55 (125 Stat. 552)} [REDACTED].

Corrective Action: Licensee was instructed to maintain Forms 4473 for denied or cancelled transactions for a period not less than 5 years.

10.

REGISTRATION OF FIREARMS - ACTION ON APPLICATION

27 CFR 479.86

Nature of the Violation: ^{b3 Public Law 112-55 (125 Stat. 552)} In instance, licensee transferred a firearm silencer to an individual that was not the silencer approved for transfer on the ATF Form 4. The

b3 Public Law 112-55 (125 Stat. 552)

Licensee's Response: Mr. Robinson acknowledged the violation and immediately called the customer to return the silencer for exchange. Customer complied and the silencer was returned for the correct one. Mr. Robinson stated the serial numbers were close and the silencer may have been placed in the wrong box and not noticed.

Corrective Action: Transferred ^{b3 Public Law 112-55 (125 Stat. 552)} [REDACTED]. Licensee was instructed to insure proper firearms are transferred when completing transactions in regard to ATF Forms 3 and 4.

**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

**11. SECURE GUN STORAGE OR SAFETY DEVICE
18 USC 922(z)**

Nature of the Violation: Licensee transferred handguns to non-licensed individuals without providing a secure gun storage or safety device for each transfer. Licensee estimated approximately [redacted] of used handgun transfers took place without a secure gun storage / safety device provided.

Licensee's Response: Mr. Gavin Robinson stated he was not aware of the requirement. Mr. Robinson stated gun locks were available in the store, but not provided on every used gun sale. Mr. Robinson stated that if a handgun was received or purchased with a lock, it was sold that way. If no lock, no lock was provided unless customer asked for one. Mr. Robinson estimated about [redacted] of used handguns were transferred without a lock. Mr. Robinson stated he has now purchased additional locks for Shooters Shop and all will ensure all handguns are transferred with a lock.

Corrective Action: Licensee was instructed that all transfers of handguns to non-licensed individuals must include a secure gun storage or safety device as defined in 18 USC 921(a)(34).

11/9/2015

X (b) (6)

(b) (6)

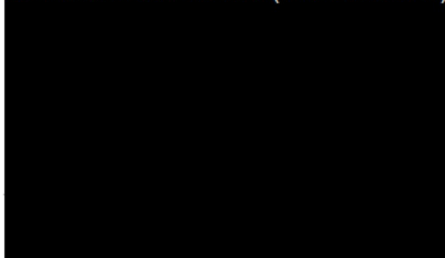
Senior Industry Operations Investigator

Signed by: ATF

Index of Worksheets and Exhibits

1. Licensee's A/D Record (omissions/discrepancies)

b3 Public Law 112-55 (125 Stat. 552)

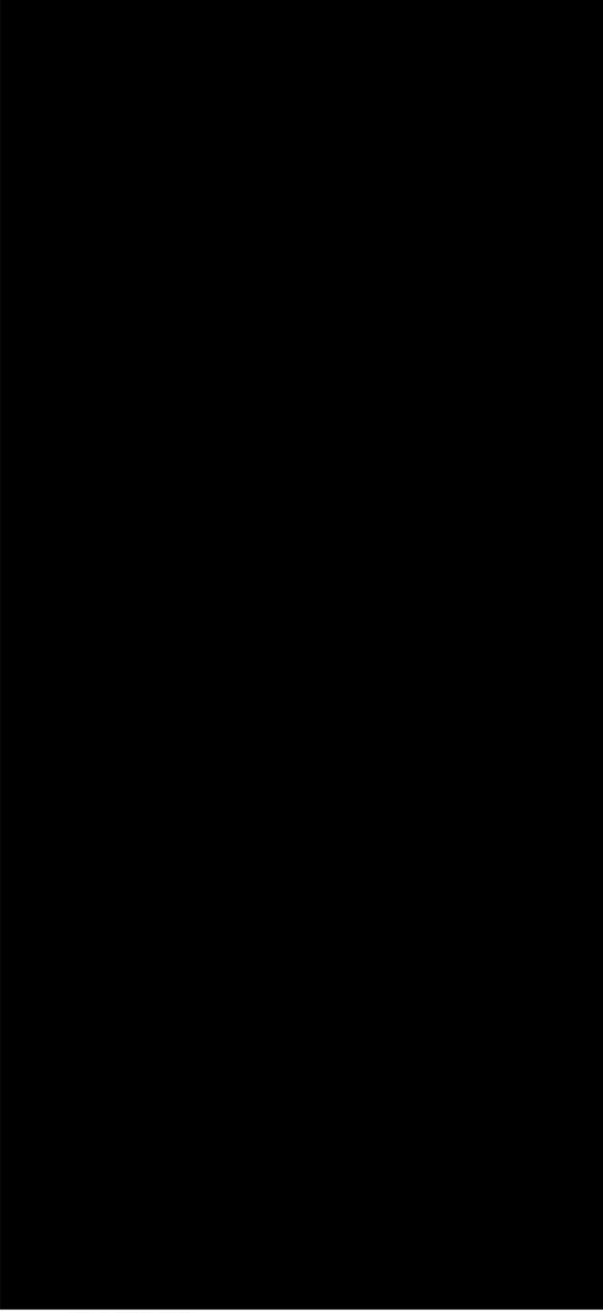


**BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT**

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FFL#: 3-39-079-01-7F-01026

b3 Public Law 112-55 (125 Stat. 552)



- 47. NFRTR
- 48. NFA Inventory / Notes
- 49. NFA Worksheet / Attachments
- 50. NICS Audit Report
- 51. Trace Report

BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES
FIREARMS INSPECTION REPORT

Name: The Shooters Shop, Inc.
Trade Name:

UI#: 778025-2015-0162-B1B
FEL#: 3-39-079-01-7F-01026

52. b3 Public Law 112-55 (125 Stat. 552)

53. Fax from Licensee 4/21/14

54. b3 Public Law 112-55 (125 Stat. 552)

55. NCIC - Stolen Firearm

56. Wisconsin DFI

57. Regulations Review



U.S. Department of Justice

Bureau of Alcohol, Tobacco,
Firearms and Explosives

1000 N. Water Street, Suite 1400
Milwaukee, WI 53202

www.atf.gov

December 8, 2015

778025 (b) (6)
5373

The Shooters Shop, Inc.
Attn: Kevin Nugent
2465 S 84th Street
West Allis, WI 53227

Re: License 3-39-079-01-7F-01026

Dear Mr. Nugent:

During a recent compliance inspection of your firearms business initiated on 8/24/2015 and completed on 10/2/2015, you were cited for violations of 27 Code of Federal Regulations, Part 478. ATF Industry Operations Investigator (b) (6) discussed the violations with you during the inspection. A copy of the Report of Violations, Form 5030.5, issued at the time of the inspection is enclosed.

You should be aware that any willful violations of Federal firearms laws and regulations might result in revocation of your Federal Firearms License. As a result of the recently cited violations, it is important we have a meeting with you to discuss the violations found. The conference will be held at 2 p.m. on December 15, 2015 at 1000 North Water Street, Suite 1400, Milwaukee, Wisconsin, 53202. The agenda for the meeting will include a discussion of the reasons for the violations, a review of the legal requirements, and a discussion of steps to be taken by you to ensure future compliance. Although we do not believe it necessary, legal counsel may assist you at your own expense if you so choose.

The records you are required to maintain and the business operations you conduct are important to law enforcement in our continuing efforts to reduce violent crime and ensure the public's safety. It is essential that you comply with all firearms laws and regulations that govern your Federal Firearms License business.

The Shooters Shop, Inc.

We will conduct a follow-up inspection in the future. Any violations, either repeat or otherwise, could be viewed as willful and may result in the revocation of your license.

Please contact IOI (b) (6) to confirm the appointment, and to ask any questions you may have regarding the conference. We look forward to meeting with you to resolve these issues.

(b) (6)

Director, Industry Operations

Enclosure

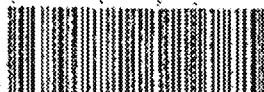
**Cc: Federal Firearms Licensing Center
Milwaukee II Field Office**

CM/7013 1710 0000 6601 9008/RRR

**U.S. DEPARTMENT OF JUSTICE
BUREAU OF ALCOHOL, TOBACCO,
FIREARMS AND EXPLOSIVES**

*Keweenaw Field Office, Area Supervisor
Alcohol, Tobacco, Firearms & Explosives
1000 N Water Street, Suite 1400
Keweenaw, WI 53222*

**OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300**



7013 1710 0000 6601 4006



1. Service Type ☐ Priority Mail Express® ☐ Registered Mail® ☐ Insured Mail® ☐ Registered Delivery® (extra fee) ☐ Yes		2. Service Type ☐ Priority Mail Express® ☐ Registered Mail® ☐ Insured Mail® ☐ Registered Delivery® (extra fee) ☐ Yes
3. Address THE SHOOTER'S SHOP INC ATTN: KEVIN NUGENT 2465 84TH STREET WEST ALLIS WI 53227		4. Address 7013 1710 0000 6601 4006

THE SHOOTER'S SHOP INC
ATTN: KEVIN NUGENT
2465 84TH STREET
WEST ALLIS WI 53227

U.S. POSTAL SERVICE		
CERTIFIED MAIL RECEIPT		
OFFICIAL USE		
Package Cost/Paid Fee Insurance Fee (if insured) Registered Delivery Fee (if insured) Total Postage & Fees	\$ 3.38 \$ 2.70 \$ \$	Received Date 12/8/15
Sent to: THE SHOOTER'S SHOP INC ATTN: KEVIN NUGENT 2465 84th Street West Allis WI 53227		

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

THE SHOOTER'S SHOP INC
ATTN: KEVIN NUGENT
2465 84TH STREET
WEST ALLIS WI 53227

Handwritten mark resembling a stylized 'S' or '7'.

COMPLETE THIS SECTION ON DELIVERY

A. Signature *[Handwritten Signature]* ☐ Agent ☐ Addressee

B. Received by (Printed Name) *Gavin Robinson* C. Date of Delivery *12/14/15*

D. Is delivery address different from form 17 ☐ Yes ☒ No
If YES, enter delivery address below:

DEC 14 2015

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™
- ☐ Registered ☐ Return Receipt for Merchandise
- ☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes ☒ No

2. Article Number
(Transfer from service label)

7013 1710 0000 6601 9006

PS Form 3811, July 2013

Domestic Return Receipt

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor THE SHOOTERS SHOP, INC	Street Address 2465 S 84TH STREET	City WEST ALLIS	State WI	ZIP Code 53227	County MILWAUKEE	Page 1 of 4 Pages
License/Permit/Registry Number (if any) 3-39-079-01-7F-01026		Expiration Date 6/1/17	Date(s) or Period of Inspection 8/24/15 (Initiated)			

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
1.	27 CFR 478.21(a)	FORMS In instance, licensee failed to have transferee complete items 10a (Are you the Actual Transferee) of Form 4473. Reference Form [redacted] (112-55 (125 Stat. 552))	Licensee was instructed to ensure that the transferee completes all items of Form 4473, Section A, before continuing with the transaction.	Immediately
2.	27 CFR 478.99(c)	PROHIBITED SALES - DELIVERIES TO PROHIBITED PERSONS In instance, licensee proceeded with a transaction and transferred a firearm to an individual who answered "yes" to Form 4473 question 11i (misdemeanor crime of domestic violence). Reference Form [redacted] (112-55 (125 Stat. 552))	Licensee was instructed to stop a transaction where the buyer/transferee indicates they are prohibited from receiving/possessing a firearm.	Immediately
3.	27 CFR 478.124(a)	FIREARMS TRANSACTION RECORD In instances, licensee transferred a firearm but failed to have transferee complete a Form 4473. Reference denied Form [redacted] (112-55 (125 Stat. 552))	Licensee shall complete Form 4473 when required. Licensee may not re-use or continue a transaction on a Form where the background check has been denied	Immediately

I have Received a Copy of This Report of Violations (Proprietor's signature and title)

Signature and Title of ATF Officer

(b) (6)

Senior Investigator

Date

Date

10/2/15
ATF Form 5810-1
Revised April 2005

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor THE SHOOTERS SHOP, INC	Street Address 2465 S 84TH STREET	City WEST ALLIS	State WI	ZIP Code 53227	County MILWAUKEE	Page 2 of 4 Pages
License/Permit/Registry Number (if any) 3-39-079-01-7F-01026		Expiration Date 6/1/17	Date(s) or Period of Inspection 8/24/15 (Initiated)			

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
4.	27 CFR 478.124(c)(1)	FIREARMS TRANSACTION RECORD In instances, licensee failed to have transferee complete or properly complete items 2, 3, 7 and 11 of Form 4473. See detail in attached addendum A. In item 2, licensee had instructed transferee to record residence address information as shown on transferee's ID, even though information was not current and correct (instances). In item 11, questions were left unanswered in instances.	Licensee was instructed to ensure all items of Form 4473 section A are properly completed by transferee. Transferee must record actual residence address in item 2.	Immediately
5.	27 CFR 478.124(c)(3)(i)	FIREARMS TRANSACTION RECORD In instances, licensee accepted an invalid or insufficient identification document (ID) from transferee. In instances the transferee presented an expired ID. In instance, the expiration date was not recorded. In instances, licensee accepted an ID that did not reflect the transferee's current address.	Licensee was instructed to carefully review ID for transferee's name, current address, date of birth and photo. ID must be a valid government issued document.	Immediately
6.	27 CFR 478.124(c)(4)	FIREARMS TRANSACTION RECORD In instance, firearm information in regard to a [redacted] was omitted from Form 4473 (Reference Form [redacted]).	Licensee was instructed to correct Forms 4473 on a photocopy of the original and ensure firearms information is recorded on Forms 4473 in future.	Immediately

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor THE SHOOTERS SHOP, INC	Street Address 2465 S 84TH STREET	City WEST ALLIS	State WI	ZIP Code 53227	County MILWAUKEE	Page 3 of 4 Pages
License/Permit/Registry Number (if any) 3-39-079-01-7F-01026		Expiration Date 6/1/17	Date(s) or Period of Inspection 8/24/15 (Initiated)			

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you.

Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
7.	27 CFR 478.125(e)	RECORD OF RECEIPT AND DISPOSITION Licensee failed to properly maintain a record of receipt and disposition of firearms. Inspection found the following: -licensee failed to properly record firearm information -licensee failed to record the disposition of a firearm -licensee could not account for the whereabouts or disposition of firearms See detail in attached Addendum B.	Licensee was instructed to update and correct the receipt / disposition record for the noted discrepancies. Licensee was also instructed to file ATF F 3310.11, Federal Firearms Licensee Theft/Loss Report for missing firearms.	10/3/15
8.	27 CFR 478.126a	REPORT OF MULTIPLE SALE In instances, licensee failed to timely file ATF F 3310.4, Report of Multiple Sale. Licensee also failed to include information on the Report of Multiple Sale.	Licensee was instructed to file an Amended Form 3310.4 for the Report which omitted the information. Licensee was instructed that Forms 3310.4 should be filed by the close of the business day that the multiple sale occurred.	Immediately
9.	27 CFR 478.129(b)	RECORDS - RETENTION In instances, licensee could not locate Forms 4473 for denied transactions within the last year (Reference Denials). In addition, licensee could not locate or did not maintain Forms 4473 relating to denied or cancelled transactions for years 2011 through 2013.	Licensee was instructed to maintain Forms 4473 for denied or cancelled transactions for a period not less than 5 years.	Immediately

Report of Violations

Instructions

Please write firmly with a ball point pen when completing this form. ATF officers will prepare this form in triplicate. The original copy will be given to the proprietor or a responsible representative. The remaining copies will be submitted with the completed inspection report. Supervisors will detach one copy from the completed report for their files.

Name of Proprietor THE SHOOTERS SHOP, INC	Street Address 2465 S 84TH STREET	City WEST ALLIS	State WI	ZIP Code 53227	County MILWAUKEE	Page 4 of 4 Pages
License/Permit/Registry Number (if any) 3-39-079-01-7F-01026		Expiration Date 6/1/17	Date(s) or Period of Inspection 8/24/15 (Initiated)			

Inspection Results

An examination of your premises, records and operations has disclosed the following violations which have been explained to you:

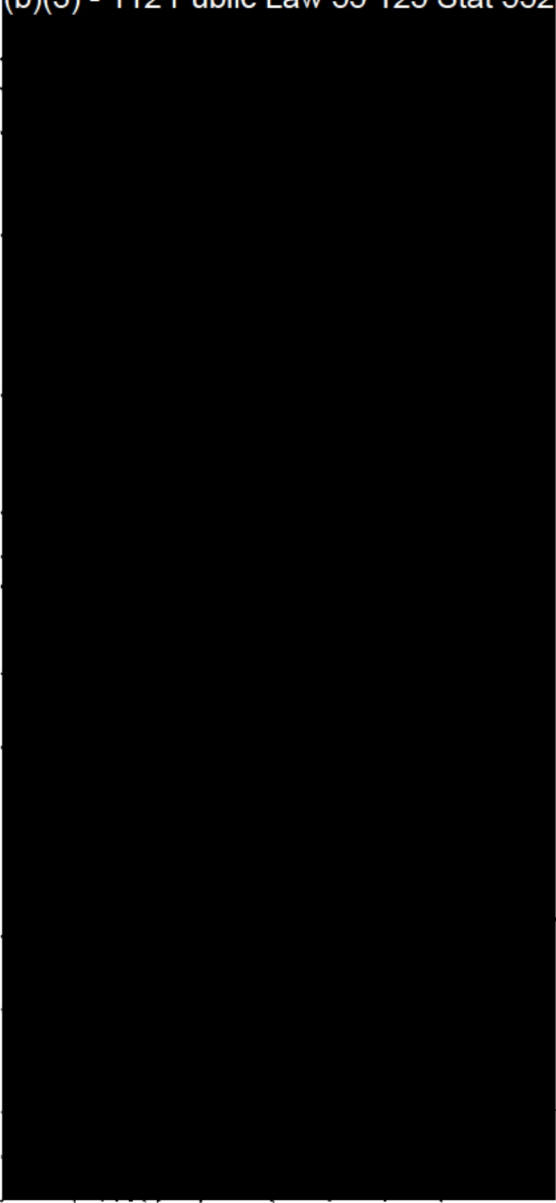
Number	USC or CFR Citation	Nature of Violation	Corrective Action to be Taken (If not corrected immediately)	Date Corrections to be Made (If not corrected immediately)
10.	27 CFR 479.86	REGISTRATION OF FIREARMS - ACTION ON APPLICATION In this instance, licensee transferred a firearm silencer to an individual that was not the licensee approved for transfer on the ATF Form 4. The firearm silencer approved for transfer was [REDACTED] (33 Public Law 112-55 (125 Stat. 552))	Transferce returned [REDACTED] (33 Public Law 112-55 (125 Stat. 552)) Licensee was instructed to insure proper firearms are transferred when completing transactions in regard to ATF Forms 3 and 4.	Immediately.
11.	18 U.S.C. 922(z)	SECURE GUN STORAGE OR SAFETY DEVICE Licensee has transferred handguns to non licensed individuals without providing a secure gun storage or safety device for each transfer. Licensee has estimated approximately [REDACTED] handgun transfers took place without a secure gun storage / safety device provided. (33 Public Law 112-55 (125 Stat. 552))	Licensee was instructed that all transfers of handguns to non licensed individuals must include a secure gun storage or safety device as defined in 18 USC 921(a)(34).	Immediately

The Shooters Shop, Inc

FFL 3-39-01026

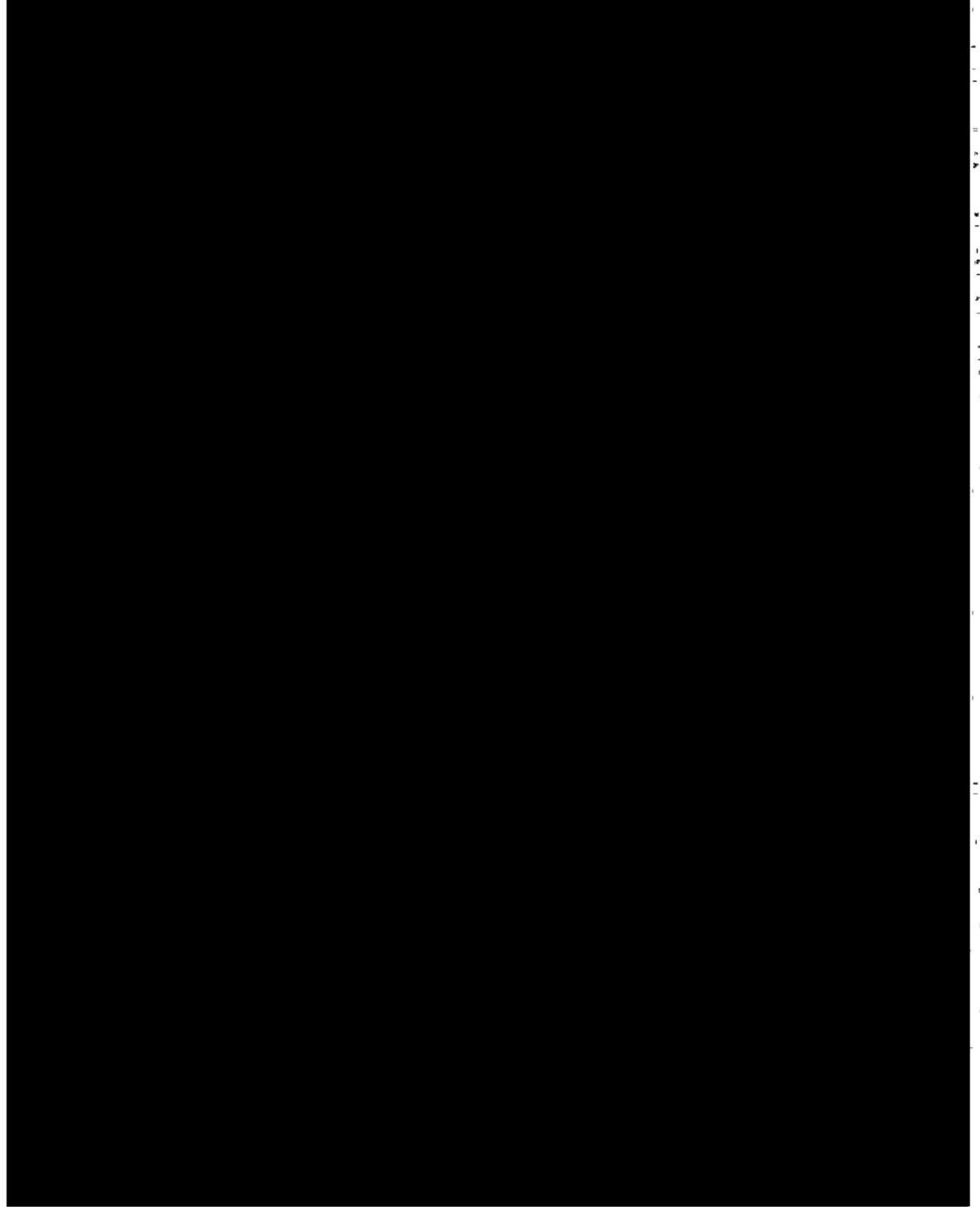
Report of Violations - Addendum A

(b)(3) - 112 Public Law 55 125 Stat 552

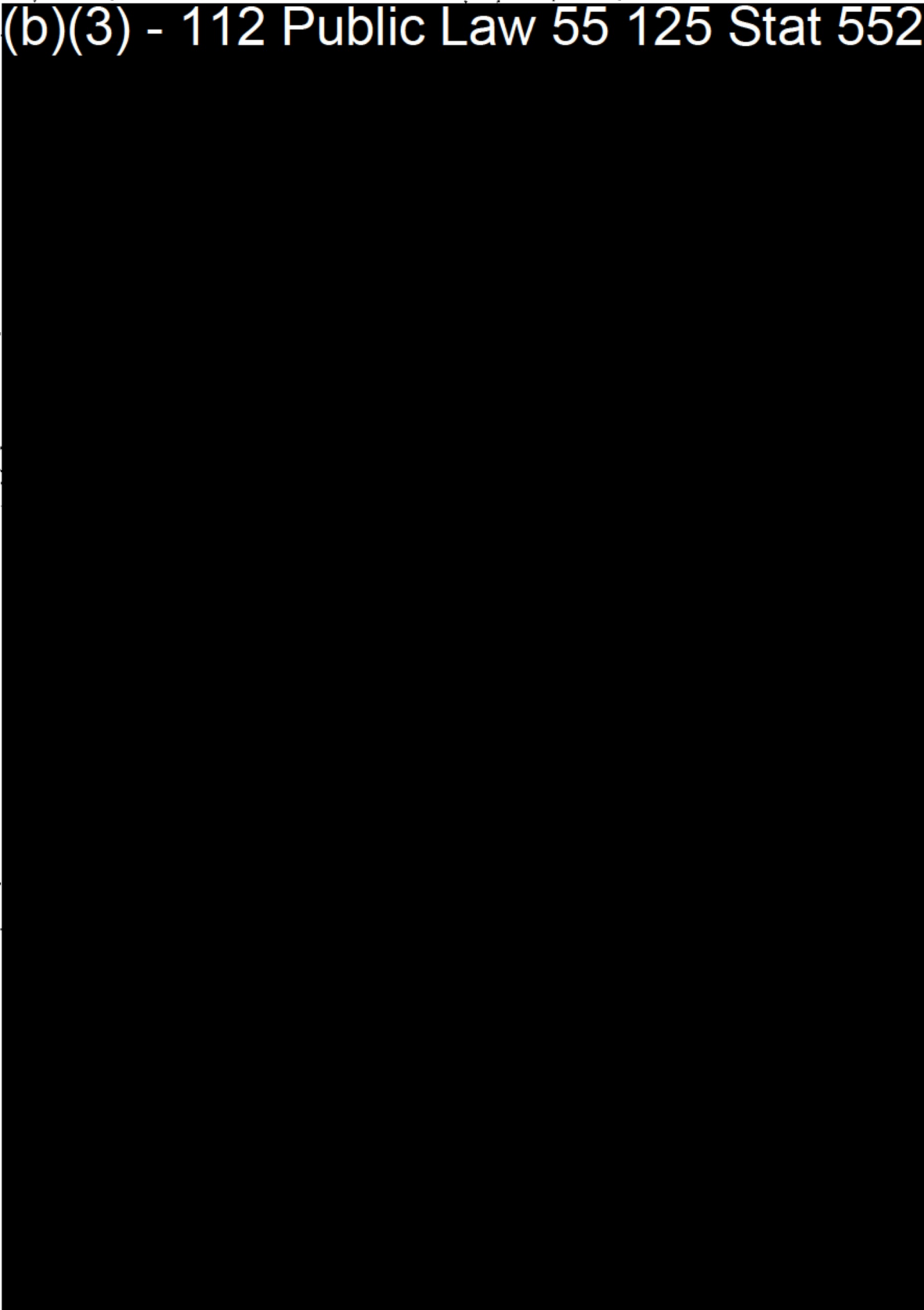


The Shooters Shop Inc
FFL 3-39-01026
Report of Violations - Addendum B

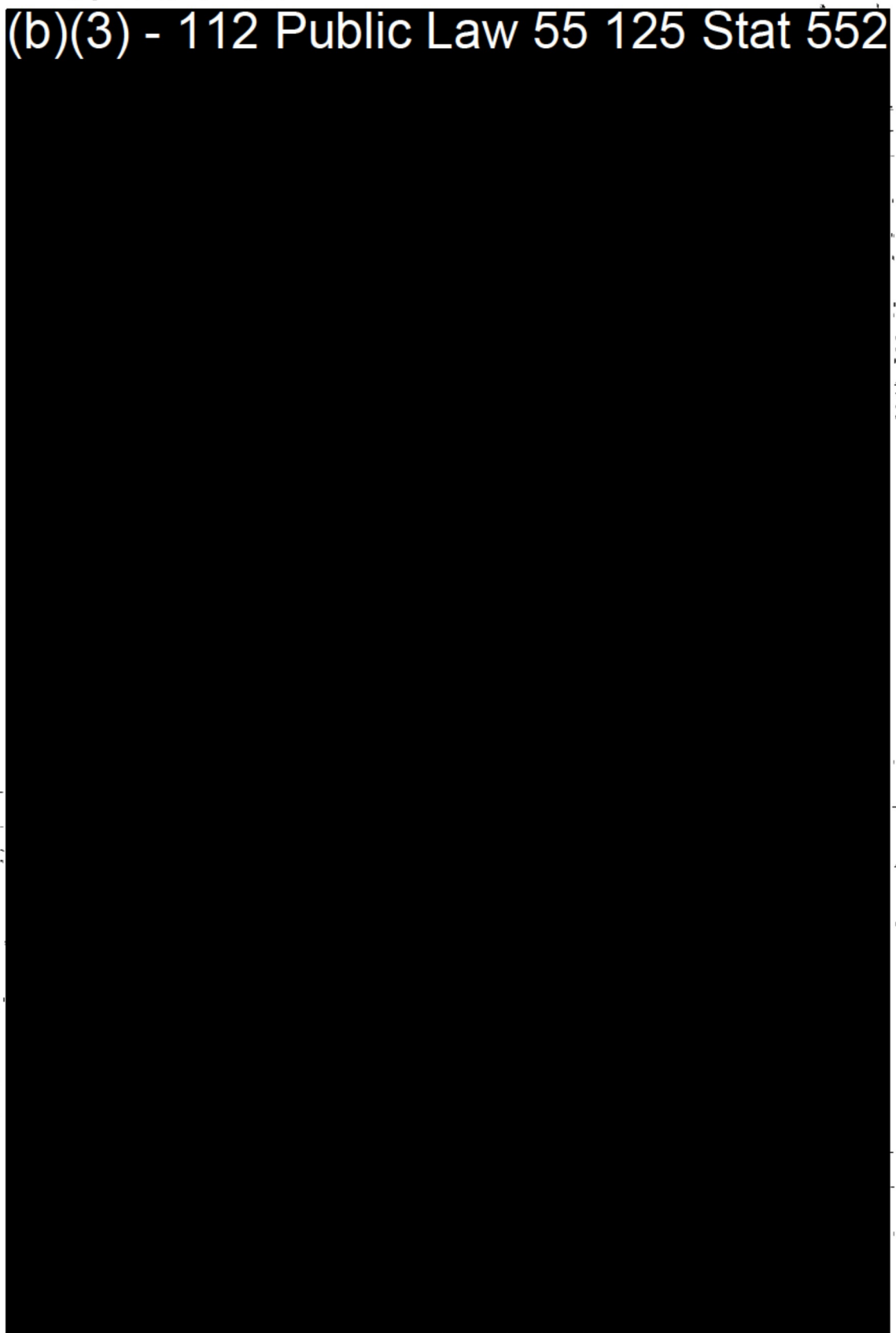
(b)(3) - 112 Public Law 55 125 Stat 552



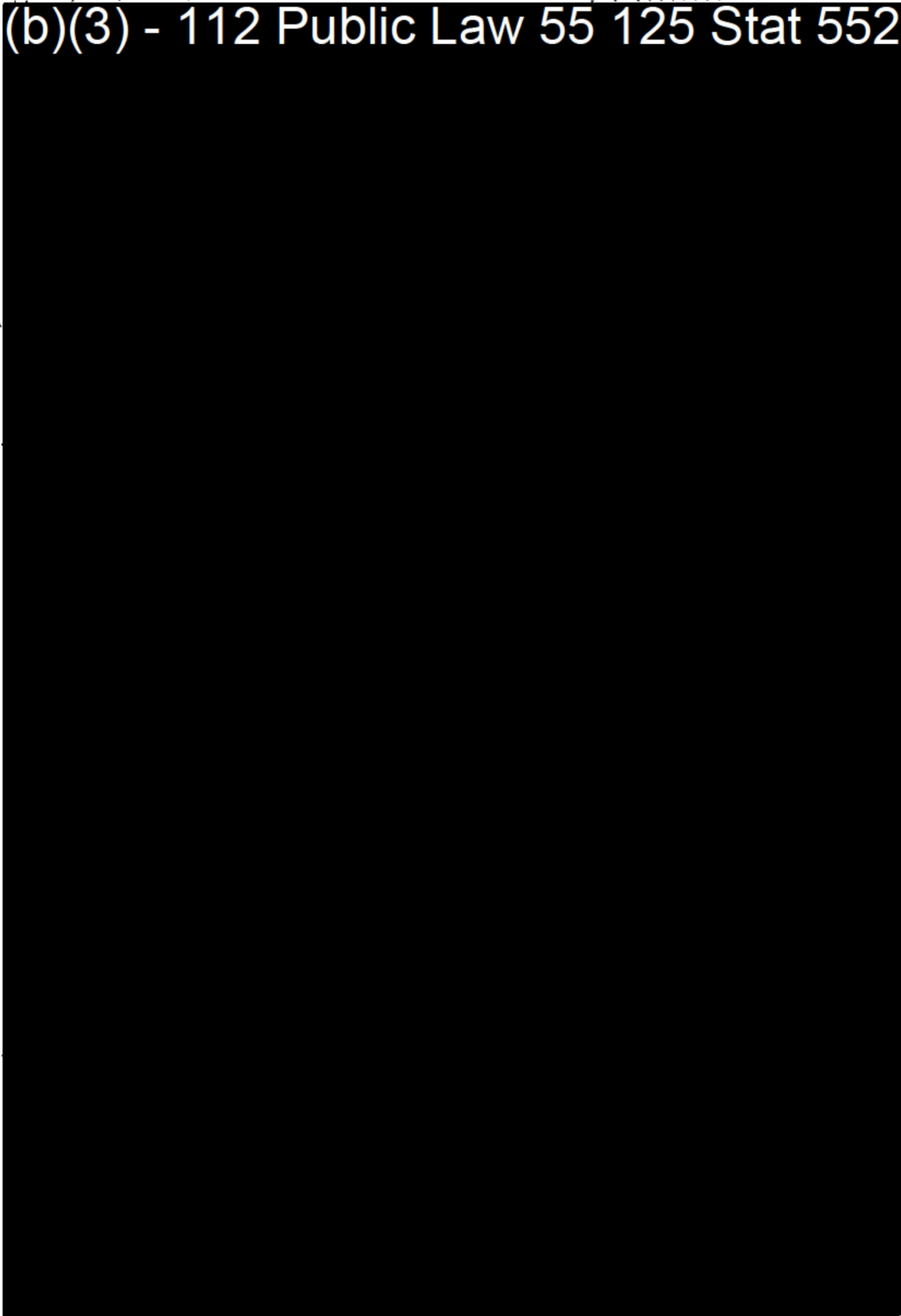
(b)(3) - 112 Public Law 55 125 Stat 552



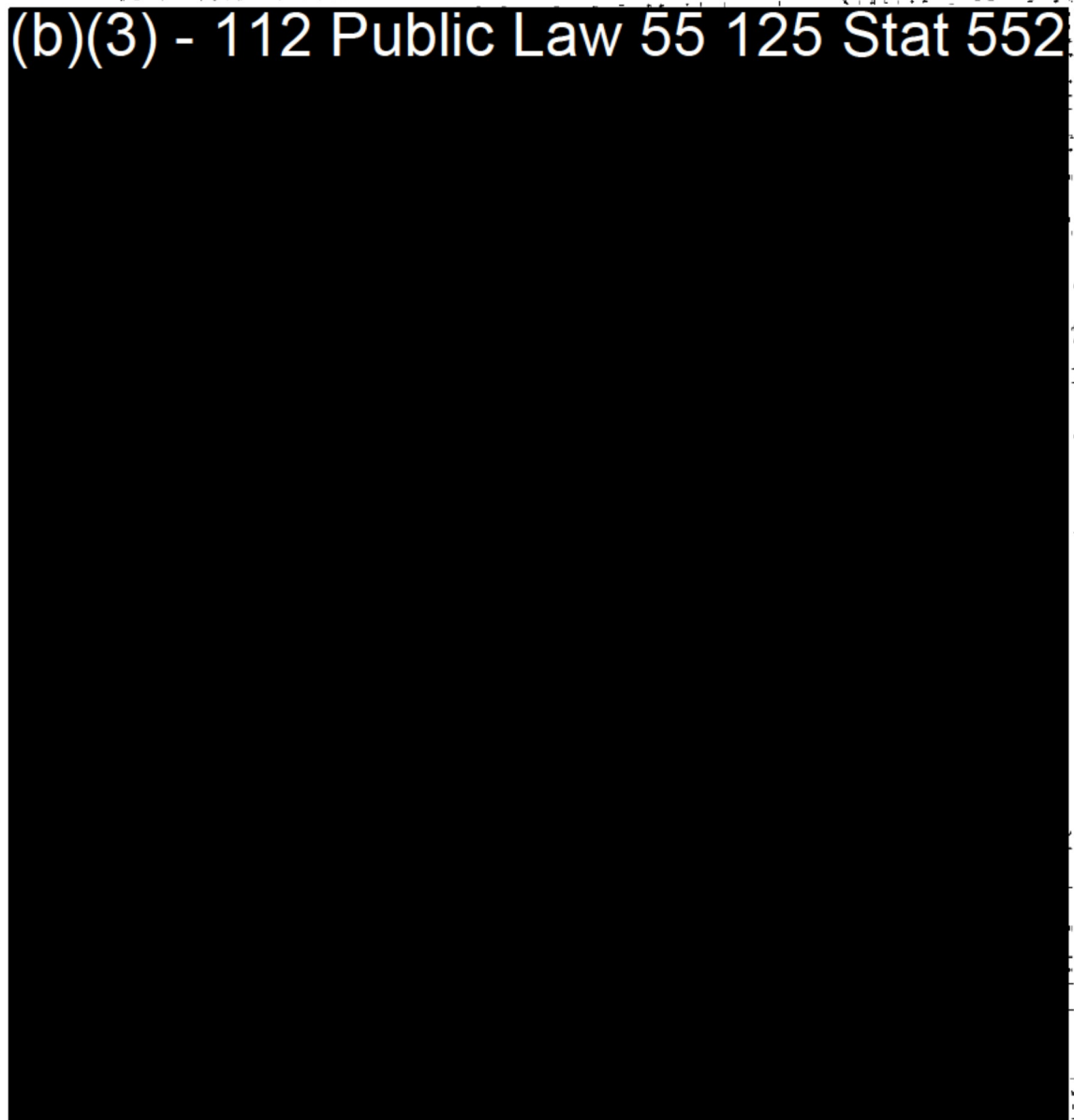
(b)(3) - 112 Public Law 55 125 Stat 552



(b)(3) - 112 Public Law 55 125 Stat 552



(b)(3) - 112 Public Law 55 125 Stat 552





U.S. Department of Justice

**Bureau of Alcohol, Tobacco,
Firearms and Explosives**

1000 North Water Street, Suite 1400
Milwaukee, WI 53202

www.atf.gov

December 16, 2015

778025(b) (6)
5373

The Shooters Shop, Inc.
Attn: Kevin Nugent
2465 S 84th Street
West Allis, WI 53227

Re: License 3-39-079-01-7F-01026

Dear Mr. Nugent:

This letter is a follow-up to the warning conference held with you on December 15, 2015 at the ATF Milwaukee Field Office. During this conference, the violations cited during the inspection initiated on August 24, 2015 and the necessary corrective action to prevent the violations from recurring were discussed.

You were given the opportunity to comment on the violations and what specific action you have taken to ensure that the violations would not recur. In general, you expressed that the violations cited were very serious and the inspection results overall were inexcusable. In regard to inventory control and the records of receipt and disposition, you stated that new procedures are now in place. A spot check records / inventory review will be conducted on a weekly basis and a more comprehensive records / inventory review will be conducted on a monthly basis. A full physical inventory with comparison to records of receipt disposition will be conducted every four months. Finally, you have re-organized your physical inventory to have all firearms located in the showroom area for better control.

In regard to firearm transactions and ATF Forms 4473 in general, you stated that ATF Forms 4473 are now being reviewed three times for completeness: reviewed at the point of sale by sales clerk and a second reviewer, at the end of the day and again on the following day. You indicated your employees have been educated on the deficiencies found during this inspection, including purchaser's place of residence and identification and are now properly following procedures.

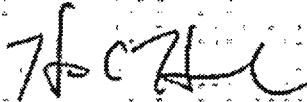
The Shooters Shop, Inc.

Regarding retention of records and missing Forms 4473 (denied transactions), you acknowledged the importance of these records and indicated previous management left records in disarray. You stated that you have been working to organize those records and account for any missing Forms.

The violations for which you were cited could adversely impact law enforcement's ability to reduce violent crime and protect the public. You are reminded that future violations, repeat or otherwise, could be viewed as willful and may result in the revocation of your license. You may anticipate further inspections to ensure your compliance.

Please contact us if you have any questions concerning your responsibilities as a licensee or if you require further clarification about particular requirements of Federal firearms laws.

Sincerely yours,



Hans Hummel
Director, Industry Operations

Cc: Federal Firearms Licensing Center
Milwaukee II Field Office

CM7013 1710 0000 6601 9022/RRR

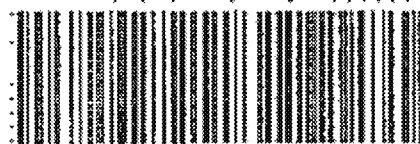
7013 1710 0000 6601 9022

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage \$	
Certified Fee	3.30
Return Receipt Fee (Endorsement Required)	2.70
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Postmark Here 12/16/15	
Sent to: The Shooter's Shop Inc Attn: Kevin Nugent Street, Apt. No. or PO Box No.: 2465 S 84th Street City, State, ZIP+4: West Allis WI 53227	
PS Form 3800, August 2010 See Reverse for Instructions	

7013 1710 0000 6601 9022

U.S. Postal Service	
CERTIFIED MAIL RECEIPT	
(Domestic Mail Only; No Insurance Coverage Provided)	
For delivery information visit our website at www.usps.com	
OFFICIAL USE	
Postage \$	
Certified Fee	3.30
Return Receipt Fee (Endorsement Required)	2.70
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees \$	
Postmark Here 12/16/15	
Sent to: The Shooter's Shop Inc Attn: Kevin Nugent Street, Apt. No. or PO Box No.: 2465 S 84th Street City, State, ZIP+4: West Allis WI 53227	
PS Form 3800, August 2010 See Reverse for Instructions	

U.S. DEPARTMENT OF JUSTICE
BUREAU OF ALCOHOL, TOBACCO, FIREARMS
AND EXPLOSIVES
AREA SUPERVISOR
1000 N WATER STREET SUITE 1400
MILWAUKEE, WI 53202
OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE \$300



7013 1710 0000 6601 9022



THE SHOOTER'S SHOP INC
ATTN: KEVIN NUGENT
2465 S 84TH STREET
WEST ALLIS WI 53227

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece or on the front if space permits.		A. Signature ☐ Agent ☐ Addressee X	
1. Article Addressed to: THE SHOOTER'S SHOP INC ATTN: KEVIN NUGENT 2465 S 74TH STREET WEST ALLIS WI 53227		B. Received by (Printed Name) Robt J. Nugent	
		C. Date of Delivery 12-18-15	
		D. Is delivery address different from item 1? ☐ Yes ☐ No If YES, enter delivery address below:	
		3. Service Type ☒ Certified Mail® ☐ Priority Mail Express™ ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ Collect on Delivery	
		4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No	
2. Article Number (Transfer from service label) PS Form 3811, July 2013		7013 1710 0000 6601 9022 Domestic Return Receipt	

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.		A. Signature ☐ Agent ☐ Addressee X	
1. Article Addressed to: THE SHOOTER'S SHOP INC ATTN: KEVIN NUGENT 2465 S 74TH STREET WEST ALLIS WI 53227		B. Received by (Printed Name)	
		C. Date of Delivery	
		D. Is delivery address different from item 1? ☐ Yes ☐ No If YES, enter delivery address below:	
		3. Service Type ☒ Certified Mail® ☐ Priority Mail Express™ ☐ Registered ☐ Return Receipt for Merchandise ☐ Insured Mail ☐ Collect on Delivery	
		4. Restricted Delivery? (Extra Fee) ☐ Yes ☐ No	
2. Article Number (Transfer from service label) PS Form 3811, July 2013		7013 1710 0000 6601 9022 Domestic Return Receipt	

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)
 For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$	Postmark New 12/16/15
Certified Fee	3.30	
Return Receipt Fee (Endorsement Required)	2.70	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent to: The Shooter's Shop Inc
 Attn: Kevin Nugent
 Street, Apt. No. or PO Box No. 2465 S 84th Street
 City, State, ZIP+4 West Allis WI 53227

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)
 For delivery information visit our website at www.usps.com

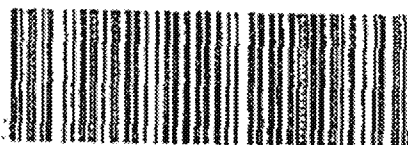
OFFICIAL USE

Postage	\$	Postmark New 12/16/15
Certified Fee	3.30	
Return Receipt Fee (Endorsement Required)	2.70	
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

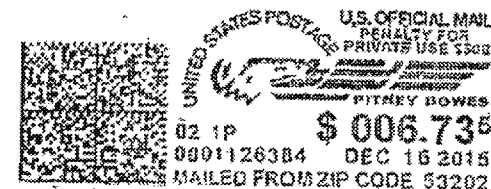
Sent to: The Shooter's Shop Inc
 Attn: Kevin Nugent
 Street, Apt. No. or PO Box No. 2465 S 84th Street
 City, State, ZIP+4 West Allis WI 53227

U.S. DEPARTMENT OF JUSTICE
 BUREAU OF ALCOHOL, TOBACCO, FIREARMS
 AND EXPLOSIVES
 AREA SUPERVISOR
 1000 N WATER STREET SUITE 1400
 MILWAUKEE, WI 53202
 OFFICIAL BUSINESS
 PENALTY FOR PRIVATE USE \$300

CERTIFIED MAIL



7013 1710 0000 6601 9022



THE SHOOTER'S SHOP INC
 ATTN KEVIN NUGENT
 2465 S 84TH STREET
 WEST ALLIS WI 53227